

Thursby, Kim

From: John.Nichols@gd-ots.com
Sent: Friday, February 03, 2012 2:36 PM
To: Epost HWRS
Cc: William.Carroll@gd-ots.com; Jan.Hughes@gd-ots.com
Subject: RE: St. Marks Powder;FLD047096524;Final Issuance

St Marks Powder acknowledges receipt of the issuance of Permit Number 0066244-003-HO for the Operation of a Hazardous Waste Miscellaneous Unit, Postclosure of the Old Sludge Pile and HSWA Corrective Action.

John Nichols
Director, St marks Operations

From: Epost HWRS [<mailto:EpostHWRS@dep.state.fl.us>]
Sent: Friday, February 03, 2012 1:59 PM
To: Nichols, John (St. Marks)
Cc: Bahr, Tim; Coates, John; Byer, James; Carroll, Bill (St. Marks); Echevarria, Edgar; FWCConservationPlanningServices@myfwc.com; knight.karen@epamail.epa.gov; Frank.Lesesne@tetrattech.com; rmerritt@mywakulla.com; heath_rauschenberger@fws.gov; cityofst.marks@comcast.net; Woehle, Melissa; Russell, Merlin; Tripp, Anthony; Kothur, Bheem
Subject: St. Marks Powder;FLD047096524;Final Issuance

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation Section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to epost_hwrs@dep.state.fl.us. (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at www.adobe.com/products/acrobat/readstep2.html.

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Tim Bahr
Environmental Administrator
Hazardous Waste Regulation
Department of Environmental Protection
E-Mail Address: epost_hwrs@dep.state.fl.us

Please take a few minutes to share your comments on the service you received from the department by clicking on this link. [DEP Customer Survey](#).



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

February 03, 2012

SENT VIA E-MAIL

John.Nichols@gd-ots.com

St. Marks Powder, Inc.
7121 Coastal Highway
Crawfordville, Florida 32355

SUBJECT: St. Marks Powder
FLD047096524
Operating Permit No. 0066244/HO/003

Dear Mr. Nichols:

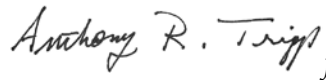
Enclosed is Permit Number 0066244-003-HO for the Operation of a Hazardous Waste Miscellaneous Unit, Postclosure of the Old Sludge Pile and HSWA Corrective Action. This permit is being issued pursuant to Section 403.722, Florida Statutes (F.S.), and Chapters 62-4, 62-160, 62-730, and 62-780, Florida Administrative Code (F.A.C.).

This permit is final and effective ("issued") on the date filed with the Clerk of the Department. When the permit is final, any party to the permit has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice to Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, MS #35, Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal.

The Notice of Appeal must be filed within thirty (30) days from the date the final permit is issued. If you should have any questions, please contact Merlin D. Russell Jr. at merlin.russell@dep.state.fl.us or (850) 245-8796.

Mr. John J. Nichols
Page Two
February 03, 2012

Sincerely,

 for Tim Bahr

Tim J. Bahr, Administrator
Hazardous Waste Regulation

TJB/mdr

cc via e-mail w/ enclosure:

Jim Byer, FDEP/Pensacola, James.Byer@dep.state.fl.us

Bill Carroll, SMP, BGCarroll@stm.gd-ots.com

Edgar Echevarria, FDEP Tallahassee, Edgar.Echevarria@dep.state.fl.us

Florida Fish & Wildlife Conservation Commission Planning Services

FWCConservationPlanningServices@myfwc.com

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Melissa Woehle, FDEP/Pensacola, Melissa.Woehle@dep.state.fl.us



Florida Department of Environmental Protection

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

BBob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-240

Herschel T. Vinyard Jr.
Secretary

PERMITTEE:
St. Marks Powder, Inc.
7121 Coastal Highway
Crawfordville, Florida 32327

I.D. NUMBER: FLD047096524
PERMIT/CERTIFICATION NUMBER: 0066244-003-HO
DATE OF ISSUE: FEBRUARY 3, 2012
EXPIRATION DATE: October 1, 2016

ATTENTION:
John J. Nichols
St. Marks Powder, Inc.

COUNTY: WAKULLA
LATITUDE/LONGITUDE: 30°10'04"N/84°13'12"W
PROJECT: OPERATION OF A HAZARDOUS WASTE
MISCELLANEOUS UNIT; POSTCLOSURE OF A
LANDFILL AND HSWA CORRECTIVE ACTION

Pursuant to authorization obtained by the Florida Department of Environmental Protection (FDEP) under the Resource Conservation and Recovery Act [42 United States Code (U.S.C.) 6901, *et seq.*, commonly known as RCRA] and the Hazardous and Solid Waste Amendments of 1984 (HSWA), this permit is issued under the provisions of Section 403.722, Florida Statutes (F.S.) and Chapters 62-4, 62-160, 62-730, 62-777 and 62-780, Florida Administrative Code (F.A.C.). This permit replaces expired permit 0066244-002-HO. The above-named Permittee is hereby authorized to perform the work or operate the facility shown on the application dated April 1, 2011 and revised or supplemented by submissions dated September 14, 2011 that are incorporated herein and collectively referred to as the "permit application." The "permit application" also includes any approved drawing(s), plans, and other documents that are specifically identified and incorporated by reference. The RCRA-regulated units are specifically described as follows:

1. Miscellaneous Unit: Operate a hazardous waste miscellaneous open burn unit (OBU) on St. Marks Powder, Inc. property. The operation consists of open burning of waste explosives. Three steel pans are located on a concrete pad connected to a propane delivery piping system that facilitates startup of the burn events. The burn pans provide containment of waste materials and resulting burn residues. A "popping kettle" is located on the pad for use when explosive devices are treated. The reactive waste (D003) generated in the manufacturing process is collected in 20 gallon drums and transported to the OBU where the drums are placed in the burn pans for treatment. Waste explosive materials are placed in the "popping kettle" for treatment. The spent brass casings from this operation are recycled. Operation of the facility shall be in accordance with the revised Permit Application dated September 1993, the April 4, 1996 submittal, the March 16, 2001 submittal and the renewal application dated April 1, 2011.
2. Management Area (WMA1): Provide postclosure care for the Landfill (Old Sludge Pile).

PERMITTEE:
St. Marks Powder, Inc.
7121 Coastal Hwy.
Crawfordville, Fl. 32355

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The Permittee is required to investigate any releases of contaminants to the environment at the facility regardless of the time at which waste was placed in a unit and to take appropriate corrective action for any such releases. Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) identified to date are listed in Appendix A. Pursuant to 40 Code of Federal Regulations (C.F.R.) 260.10 [as adopted by reference in Subsection 62-730.020(1), F.A.C.], the corrective action requirements of this RCRA permit extend to all contiguous property under the control of the Permittee (Attachment A, a figure that demarks the property boundaries of land under the Permittee's control) and to all contamination that originated from discharges at the contiguous property under control of the Permittee.

This permit is based on the premise that information and reports submitted by the Permittee prior to issuance of this permit are accurate. Any inaccuracies found in this information or information submitted as required by this permit may be grounds for termination or modification of this permit in accordance with Rule 62-730.290, F.A.C., and potential enforcement action.

The facility is located at 7121 Coastal Highway, Crawfordville, Florida 32327.

The following documents were used in the preparation of this permit. Each is listed in chronologic order:

1. January 28, 1983 Certification of Closure for Waste Pile (SWMU 1).
2. February 9, 1984 DER acceptance of the Certification of Closure for Waste Pile (SWMU 1).
3. January 31, 1992 *Risk-based Clean Closure Permit Application*, Table K-1 and Figure K-1 only.
4. December 6, 1993 Clean Closure Certification for the Hazardous Waste Incinerator.
5. February 3, 1994 DEP acceptance of the Clean Closure Certification for the Hazardous Waste Incinerator.
6. March 23, 1995 *Risk-based Clean Closure Permit Application*.
7. September 25, 1995 *Closure/Post-Closure Permit Modification Application HF65-200289 Response to Comments, First Notice of Deficiencies (NOD)*.
8. March 1996 *Hazardous Waste Facility Construction and Operating Permit Application*.
9. April 4, 1996 *Revised Permit Application for Subpart X Permit Application No. HO65-199411*.
10. November 12, 1996 *Risk-based Clean Closure Certification, WMA 1 (excluding the Old Sludge Pile) and WMA 2*
11. December 23, 1996 DEP acceptance of the *Risk-based Clean Closure Certification, WMA 1 (excluding the Old Sludge Pile) and WMA 2*.
12. February 14, 1997 Certification of Closure for the Old Sludge Pile.
13. May 8, 1997 FDEP letter of acceptance of closure for the Old Sludge Pile.
14. June 23, 1997 Deed restriction for the Old Sludge Pile filed and recorded with the Wakulla County, Florida Clerk of Court.
15. October 1997 *Documentation and Engineering Certification of Open Burn Unit Reconstruction*.
16. January 16, 2001 *Amendment to Confirmatory Sampling Report*

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17. January 29, 2001 *Corrective Measures Sampling Report*.
18. March 5, 2001 EPA approval of *Corrective Measures Sampling Report and Amendment to Corrective Measures Sampling Report*.
19. March 16, 2001 Part B renewal application for operation of the Open Burn Unit (OBU), postclosure activities at the Old Sludge Pile (this was the first combined OP and postclosure permit application).
20. August 30, 2002 DEP approval of *Resource Conservation and Recovery Act Interim Measure Completion Report for SWMUs 37, 40 and 42 at St. Marks Powder, Inc.; FLD. 047 096 524*.
21. January 8, 2003 DEP approval of *Resource Conservation and Recovery Act Interim Measure Completion, Solid Waste Management Units 21 and 23, St. Marks Powder, St. Marks, Wakulla County, Florida*.
22. February 3, 2003 summary of the investigation and remedial measures conducted at the pipeline leak at the North Sweetie Barrel Lift Station (SWMU 30).
23. September 11, 2006 DEP approval of the April 26, 2006 Corrective Measures Study.
24. April 4, 2008 *Annual Groundwater Monitoring Plan*.
25. August 2008 *Interim Measure Completion, Solid Waste Management Units 21 and 23, St. Marks Powder, St. Marks, Wakulla County, Florida*.
26. October 7, 2008 DEP approval of NFA for the Nitric/Sulfuric Acid Sludge Release Area at the Nitroglycerin Facility (SWMU 45).
27. October 15, 2009 Declaration of Restrictive Covenant for AOC A-Combustible Fibers Test Unit, SWMU 21-Covered Scrap Ditches, SWMU-23 Scrap Metal Decontamination Area, SWMU-28 Nitroglycerin Spill Area, SWMU 37-Decontamination Area, SWMU-40 Pack Cleaning Interim Storage, SWMU Acid Spill Area and the Old Sludge Pile.
28. December 2010 *Emergency and Disaster Response Operations Plan, St. Marks Powder, Inc. Revision 15*.
29. April 1, 2011 Part B renewal application for operation of the Open Burn Unit (OBU), postclosure activities at the Old Sludge Pile and sitewide corrective action.
30. July 2011 St. Marks Powder's Response to the First Notice of Deficiencies.
31. July 22, 2011 *Groundwater Recovery System for Diphenylamine, Solid Waste Management Units 21 and 23*.
32. September 14, 2011 response to the First Notice of Deficiencies.
33. October 2011 revised cost estimates, revised Sampling & Analysis Plan, revised Open Burn Unit Closure Plan and revised Old Sludge Pile Closure Plan.
34. October 19, 2011 revisions to Attachment II.A.4(a) Security Procedures and Equipment.
35. November 2011 Sampling & Analysis Plan.
36. November 28, 2011 DEP approval of summary of the investigation and remedial measures conducted at the North Sweetie Barrel Lift Station (SWMU 30) dated February 3, 2003 and *Interim Measures Workplan for Solid Waste Management Unit 30* dated August 30, 2002.

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PART I-GENERAL AND STANDARD CONDITIONS

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are “permit conditions” and are binding and enforceable pursuant to Sections 403.141 and 403.727, F.S. The Permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Sections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the Permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The Permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the Permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The Permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under conditions of the permit;

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Crawfordville, Fl. 32355

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- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any time or location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. The Permittee shall comply with the following notification and reporting requirements:

- a. If, for any reason, the Permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the Permittee shall immediately provide the Department with the following information:

- (1) A description of and cause of noncompliance; and
- (2) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

- b. Notification of any noncompliance or emergency response including interim source removal, which may endanger health or the environment, including the release of any hazardous waste that may endanger public drinking water supplies or the occurrence of a fire or explosion from the facility which could threaten the environment or human health outside the facility, shall be reported verbally to the Department within 24 hours, and a written report shall be provided within five days. The verbal report shall include the name, address, I.D. number, and telephone number of the facility and its owner or operator; the date, time, and type of incident; the name and quantity of materials involved; the extent of any injuries if any; an assessment of actual or potential hazards; and the estimated quantity and disposition of recovered material. The written submission shall contain all the elements of the verbal report and:

- (1) A description and cause of the noncompliance.
- (2) If not corrected, the expected time of correction, and the steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

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- c. The Permittee shall comply with the "Notices" provisions of Rule 62-780.220, F.A.C.:
 - (1) prior to performing field activities;
 - (2) when contamination beyond the facility boundary is confirmed by laboratory analysis;
 - (3) when a temporary point of compliance (TPOC) is established beyond the boundary of the source property in conjunction with monitored natural attenuation or active remediation;
 - (4) five year annual update to the status of a TPOC; and
 - (5) warning signs at facilities where there may be a risk of exposure to the public of environmental media contaminated with hazardous waste.
- d. The Permittee shall give written notice to the Department within 15 days of any planned physical alterations or additions that could affect activities covered by this permit. The notice shall include at a minimum, a summary of the planned change, the reason for the planned change, a discussion of the effect(s) the planned change will have on the ability to investigate contamination at or from the contaminated site, and a discussion of the effect(s) the planned change will have on the known or suspected contamination.
- e. The Permittee shall revise "Part I - General" of the Application for a Hazardous Waste Facility Permit [DEP Form 62-730.900(2)(a)] and submit the revised form to the Department within 30 days of any changes in the Part I information.
- f. Biennial report: A biennial report covering facility activities during the previous calendar year shall be submitted by March 1 of each even numbered year.
- g. Manifests:
 - (1) Unmanifested waste report: The Permittee shall submit an unmanifested waste report to the Department within 15 days of receipt of unmanifested waste.

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- (2) Manifest discrepancy report: If a significant discrepancy in a manifest is discovered, the Permittee shall attempt to rectify the discrepancy. If not resolved within 15 days after the waste is received, the Permittee shall immediately submit a letter report, including a copy of the manifest, to the Department.
9. In accepting this permit, the Permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Section 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The Permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the Permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon written Department approval in accordance with Rule 62-4.120 and Subsection 62-730.290(6) F.A.C., as applicable. The Permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department. Before transferring ownership or operation of this facility during the term of this permit, the Permittee must notify the new owner or operator in writing of the requirements of 40 C.F.R. Part 264 and Chapter 62-730, F.A.C.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity. In the event that there is no building or reasonable repository for such a copy at the work site, then the permit or a copy thereof shall be kept at an alternate location agreed to by the department.
13. Reserved.
14. The Permittee shall comply with the following recordkeeping requirements:
 - a. Upon request, the Permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The Permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and

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maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit; copies of all reports required by this permit; records of all data used to complete the application for this permit; and all monitoring data required by 40 C.F.R. Part 264 Subparts F and G, and 40 C.F.R. 264.228. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

- c. Records of monitoring information shall include all required items in Chapter 62-160, F.A.C. These include at a minimum:
 - (1) The date, exact place, and time of sampling or measurements;
 - (2) The person responsible for performing the sampling or measurements;
 - (3) The dates analyses were performed;
 - (4) The person responsible for performing the analyses;
 - (5) The analytical techniques or methods used; and
 - (6) The results of such analyses.
- d. As a generator of hazardous waste, the Permittee shall retain a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced to comply with land disposal restrictions (40 C.F.R. Part 268) for at least three years from the date that the waste which is the subject of such documentation was last sent to an on property or off-property facility for treatment, storage, or disposal, or until remedial activity is completed, whichever date is later. These periods may be extended by request of the Department at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.
- e. The Permittee shall keep a written operating record at the facility, which includes:
 - (1) The results of any waste analysis;
 - (2) Copies of hazardous waste manifests for three years;
 - (3) The results of inspections;

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- (4) The closure plan, postclosure plan, and remedial action (corrective measures) plans as applicable for each contaminated site, along with cost estimates for each plan;
 - (5) Inspections of emergency and safety equipment (Condition 26 of this Part).
 - (6) Biennial reports;
 - (7) Personnel training records (Part II Subpart A - Condition 3);
 - (8) The Waste Minimization Program Plan (Part II Subpart A - Condition 8);
 - (9) Annual certification of waste minimization (Part II Subpart A - Condition 8);
 - (10) The description and quantity of each hazardous waste [received/generated];
 - (11) The location of each hazardous waste within the facility and the quantity at location;
 - (12) Notices to generators as specified in 40 C.F.R. 264.12(b);
 - (13) A log of dates of operations and unusual events;
 - (14) A summary report and details of incidents that require implementation of the contingency plan (Part II Subpart A - Condition 6);
 - (15) Monitoring and test data for 40 C.F.R. 264 Subparts AA, BB, and CC requirements; and
 - (16) Documentation that local officials have refused to enter into preparedness prevention arrangements with the Permittee.
15. Within the timeframe requested by the Department, the Permittee shall furnish any information required by law which is needed to determine compliance with the permit. If the Department's request does not include a timeframe, the time of response is 30 days. If the Permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

PERMITTEE:
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7121 Coastal Hwy.
Crawfordville, Fl. 32355

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16. Except as otherwise specifically provided in this permit, all submittals in response to permit conditions shall be provided as described below.

a. One hard and one electronic copy in optical media format shall be sent to:

Environmental Administrator
Hazardous Waste Regulation Section M.S. 4560
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

17. All documents submitted pursuant to the conditions of this permit shall be accompanied by a cover letter stating the name and date of the document submitted, the number(s) of the Part(s) and Condition(s) affected, and the permit number and project name of the permit involved.

18. All documents proposing modifications to the approved permit and involving the practice of engineering must be submitted to the Department for review and be signed, sealed, and certified by a Professional Engineer registered in the State of Florida, in accordance with Chapter 471, F.S., and Subsection 62-730.220(9), F.A.C. All submittals incorporating interpretation of geological data shall be signed and sealed by a Professional Geologist registered in the State of Florida in accordance with Chapter 492, F.S., and Subsection 62-730.220(10), F.A.C.

19. The Department of Environmental Protection's 24-hour emergency telephone number is (850) 413-9911 or (800) 320-0519. During normal business hours, the DEP District Office may be contacted at (850) 595-0652 (Pensacola).

20. The following conditions apply to permit modification and revocation of this permit:

a. The Department may modify, revoke, reissue or terminate for cause this permit in accordance with Chapters 62-4 and 62-730, F.A.C. The filing of a request for a permit modification, revocation, reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition. The Permittee may submit any subsequent modifications to the Department for approval. The application shall meet the fee requirements of Rule 62-730.293, F.A.C. The Permittee shall submit the application for revisions to the address in Condition 16 of this Part. The Permittee shall submit a copy of the cover letter accompanying the revisions and the fee to:

Florida Department of Environmental Protection

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Crawfordville, Fl. 32355

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Hazardous Waste Regulation Section
Post Office Box 3070
Tallahassee, Florida 32315-3070

- b. The modification fee may also be submitted electronically. However, if the Permittee intends to submit the modification fee electronically, the Permittee shall obtain instructions from the Department on how to submit the renewal fee electronically prior to attempting such submittal and shall follow such instructions in making the electronic fee submittal.
21. Prior to 180 calendar days before the expiration of this permit, the Permittee shall submit a complete application for the renewal of the permit on forms and in a manner prescribed by the Department unless postclosure care and all corrective action have been completed and accepted by the Department. If the Permittee allows this permit to expire prior to Department acceptance of the certification of postclosure and termination of all corrective action, the Permittee must reapply for a permit in accordance with DEP Form 62-730.900(2), F.A.C. The Permittee shall submit the renewal to the address in Condition 16 of this Part. The Permittee shall submit one copy of the cover letter accompanying the renewal and the fee to:

Florida Department of Environmental Protection
Hazardous Waste Regulation Section
Post Office Box 3070
Tallahassee, Florida 32315-3070

22. The renewal fee may also be submitted electronically. However, if the Permittee intends to submit the renewal fee electronically, the Permittee shall obtain instructions from the Department on how to submit the renewal fee electronically prior to attempting such submittal and shall follow such instructions in making the electronic fee submittal.
23. The Permittee shall comply with those sections of 40 C.F.R. Part 124 specified in Rule 62-730.200(3), F.A.C., 40 C.F.R. Parts 260 through 268, and 40 C.F.R. Part 270 as adopted in Chapter 62-730, F.A.C., until all operations have ceased and the facility has been closed and released from postclosure care requirements and all facility-wide corrective action requirements.
24. The Permittee shall comply with the security provisions of 40 C.F.R. 264.14 and the October 19, 2011 revisions to Attachment II.A.4(a) Security Procedures and Equipment.
25. If this facility is a suspected or confirmed contaminated facility where there may be a risk of exposure to the public, then upon direction from the Department the Permittee must comply with the warning sign requirements of Section 403.7255, F.S., and Subsection 62-730.225(4), F.A.C. The Permittee is responsible for supplying, installing and maintaining the warning signs.

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26. The Permittee shall visually inspect the facility emergency and safety equipment in accordance with 40 C.F.R. 264.15 and the Emergency and Disaster Operations Plan (EDROP, revision 15) dated December 2010 or latest department-approved revision, during permitted activities. The Permittee shall remedy any deterioration or malfunction discovered by an inspection, in accordance with the requirements of 40 C.F.R. 264.15(c). A schedule for the inspection of the facility emergency and safety equipment must be maintained as the operating record of the facility. Changes, additions, or deletions to the schedule must be approved in writing by the Department.
27. The Permittee shall comply with the following conditions concerning preparedness and prevention:
 - a. At a minimum, the Permittee shall have the equipment available at the facility which is described in the Emergency and Disaster Operations Plan (EDROP, revision 15) dated December 2010 or latest department-approved revision.
 - b. The Permittee shall test and maintain the required equipment as necessary to assure its proper operation in time of emergency.
 - c. The Permittee shall maintain immediate access to an internal communications or alarm system.
 - d. The Permittee shall maintain arrangements with State and local authorities as required by 40 C.F.R. 264.37. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record. At a minimum, the "State and local authorities" for this condition shall include:
 - (1) Wakulla County Sheriff Department (Primary emergency management authority and central dispatch for outside emergency medical, firefighting, and law enforcement response for Wakulla County, Florida.)
 - (2) Your Emergency Response Contractor
 - e. Copies of the most current department-approved EDROP shall be distributed to the first responders in Condition 27.d above. An electronic copy should be distributed if the first responder has the capabilities to accept and use the electronic copy.

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- f. At a minimum, the Permittee shall maintain adequate aisle space to allow the unobstructed movement of personnel, fire protection, and emergency response equipment to any area of the facility.
 - g. The Permittee shall perform, at a minimum, an annual review of the Emergency and Disaster Operations Plan to ensure that it is up to date and contains current information.
28. The conditions in this permit shall take precedence over the permit application documents where there are differences between those documents and the permit conditions.
 29. The Permittee may claim that any information required to be submitted by this permit is confidential in accordance with Subsection 62-730.100(3), F.A.C.
 30. All work plans, reports and schedules and other documents ("submittals") required by this permit are subject to approval by the Department prior to implementation. The Department will review the submittals and respond in writing. Upon written approval by the Department, the Permittee shall implement all work plans, reports and schedules as provided in the approved submittal. If the Department disapproves a submittal, the Department will:
 - a. Notify the Permittee in writing of the reason(s) why the submittal does not contain information adequate to support the conclusion, alternative, plan, proposal or recommendation, or why the conclusion, alternative, plan, proposal or recommendation is not supported by the applicable criteria. In this case the Permittee shall submit a revised submittal within 60 days of receipt of the Department's disapproval; or
 - b. Revise the submittal, or approve the submittal with conditions, and notify the Permittee of the revisions or conditions. In the case of work plans, the Department may notify the Permittee of the start date of the schedule within the revised or conditionally approved work plan.
 31. Any dispute resolution will be conducted in accordance with Chapter 120, F.S. (Administrative Procedure Act), Chapter 28-106, F.A.C., and the Department's existing rules and procedures.
 32. The following conditions apply to land disposal (placement) of hazardous wastes:
 - a. 40 C.F.R. Part 268 identifies hazardous wastes that are restricted from land disposal and defines those limited circumstances under which an otherwise prohibited waste may continue to be placed on or in a land treatment, storage, or disposal unit. The Permittee shall maintain compliance with the

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- requirements of 40 C.F.R. Part 268. Where the Permittee has applied for an extension, waiver, or variance under 40 C.F.R. Part 268, the Permittee shall comply with all restrictions on land disposal under this Part once the effective date for the waste has been reached pending final written approval of such application.
- b. A restricted waste identified in 40 C.F.R. Part 268 Subpart C may not be placed in a land disposal unit without further treatment unless the requirements of 40 C.F.R. Part 268 Subparts C and/or D are met.
 - c. The storage of hazardous wastes restricted from land disposal under 40 C.F.R. Part 268 is prohibited unless the requirements of 40 C.F.R. Part 268 Subpart E are met.
33. The Permittee shall implement remedial activities beyond the facility boundary, if there is suspected or confirmed off-property contamination, to protect human health and the environment, unless the Permittee demonstrates to the satisfaction of the Department that, despite the Permittee's best efforts, as determined by the Department, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee shall use all reasonable efforts, including but not limited to correspondence, telephone calls, personal contacts, drafting and redrafting agreements, and payment of a reasonable fee, to obtain any access to real property necessary for work to be performed in the implementation of this permit. If necessary access cannot be obtained by the Permittee, or if obtained, is revoked by owners or entities controlling access to the properties to which access is necessary, the Permittee shall notify the Department within five business days of such refusal or revocation. The Department may, at any time thereafter, seek to obtain such access as is necessary to implement the terms of this permit. The Permittee shall reimburse the Department for any reasonable expenses that the Department is ordered to pay, or that the Department incurs in connection with its efforts to obtain necessary access to said property. The Permittee shall pay these sums to the Department, or arrange a payment schedule with the Department, within 30 days of demand by the Department. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where off-property access is denied. On-site measures to address such releases will be determined on a case-by-case basis.
34. The Permittee owns the real property that comprises the Facility. If and when the Permittee intends to transfer parcels to third parties, the Permittee may drop a parcel from the Facility covered by this permit, and the Department will approve the dropping of the parcel so long as the parcel never contained a contaminated site, or so long as any contamination associated with the contaminated site has been addressed in accordance with applicable Florida regulations. The satisfaction of the Department may be conditioned on a sale with certain legal restrictions on the future use and/or remedial activity requirements on the parcel being dropped. Even though a parcel is no longer defined as part of the facility as a result of the permit modification (using the minor

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modification requirements of subsection 62-730.290(4), F.A.C.), in the unanticipated and improbable event that a previously unknown contaminated site is found on the parcel, and such contamination resulted from activities which occurred prior to the sale, the Permittee will be responsible for any corrective action along with any other persons who may have legal responsibility for the contamination.

35. The Permittee shall maintain compliance with 40 C.F.R. Part 264, Subpart H - Financial Requirements and Subsection 62-730.180(6), F.A.C. All submittals relating to financial assurance shall be submitted to:

Financial Assurance M.S. 4560
Hazardous Waste Regulation Section
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

36. Financial assurance shall be based on estimates of the costs to close the facility and to implement postclosure care and/or corrective action (including the assessment phase and interim measures) (collectively referred to hereinafter as "remedial activities") for a continuing (rolling) period of 30 years, unless this period is shortened or increased by the Department in a permit renewal or modification. The cost estimates must be based on the cost to the owner or operator of hiring a third party to conduct remedial activities. The Permittee shall include cost estimates with every work plan required by this permit. Cost estimates are subject to review and written approval by the Department. In the event the total cost estimate for all remedial activities increases beyond the amount provided by Permittee, the financial assurance instrument(s) must be increased accordingly within 60 days of the estimate increase, or, for those facilities using a financial test, in the next scheduled submittal. If the estimate increase causes the inability of the facility to provide financial assurance through its currently selected mechanism, alternate financial assurance must be provided within 60 days. If contamination from the facility goes beyond the property boundary, the Permittee shall provide assurances of financial responsibility for completion of corrective action beyond the property boundary.

PART II-OPERATING CONDITIONS

Part II Subpart A-General Operating Conditions

1. The Permittee shall notify the Department in writing four weeks prior to receipt of hazardous waste from a foreign source. Notice of subsequent shipments of the same waste from the same foreign source is not required.
2. The owner or operator of a facility that receives hazardous waste from an off-site source (except where the owner or operator is also the generator) must inform the generator in writing that he has the appropriate permit(s) for, and will accept, the waste the generator is shipping.

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3. Facility personnel must successfully complete the approved training program indicated in Attachment II.A.4(e) of the Hazardous Waste Facility Construction and Operating Permit Application Revised March 1996, and in the July 2011 St. Marks Powder Response to First Notice of Deficiencies within six months of employment or assignment to a facility or to a new position at the facility. Verification of this training must be kept with the personnel training records and maintained at the facility. Personnel shall not work unsupervised until training has been completed. The training must be reviewed by facility personnel at least annually. The Permittee shall maintain an updated list of personnel handling hazardous waste and their respective job titles at the facility.
4. The Permittee shall maintain and operate the facility to minimize the possibility of fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water that could threaten human health or the environment.
5. Permittee shall comply with the manifest requirements of 40 C.F.R. 264.71 and 264.72. The Permittee must document the reconciliation of any manifest discrepancies.
6. The Permittee shall comply with the following conditions concerning the Contingency Plan:
 - a. The Permittee shall immediately carry out the provisions of the Emergency and Disaster Operations Plan (EDROP, revision 15) dated December 2010 or latest department-approved revision, and follow the emergency procedures described by 40 C.F.R. 264.56, whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which threatens or could threaten human health or the environment. The Permittee shall give proper notification if an emergency situation arises and, within five calendar days, must submit to the Department a written report which includes all information required in Part I Condition 8(b).
 - b. The Permittee shall comply with the requirements of 40 C.F.R. 264.53.
 - c. Within seven calendar days of meeting any criterion listed in 40 C.F.R. 264.54(a), (b) or (c), the Permittee shall amend the plan and submit the amended plan for Department approval. Any other changes to the plan must be submitted to the Department within seven days of the change. Amendments to the plan must be approved in writing by the Department. All amended plans must be distributed to the appropriate agencies.
 - d. The Permittee shall comply with the requirements of 40 C.F.R. 264.55, concerning the emergency coordinator.
7. Sampling and analysis of permitted and new hazardous wastes shall be conducted in accordance with Attachment II.A.6 Waste Analysis Plan of the March 1996 *Hazardous Waste Facility Construction and Operating Permit Application*.

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- a. The Permittee is liable for waste profiles supplied to generators.
 - b. Prior to acceptance of new waste codes a permit modification is required.
8. The Permittee shall develop and maintain a Waste Minimization Program Plan. The Permittee shall maintain copies of the certification required by this Condition in the facility operating record for a minimum of three years. The Permittee must certify, no less often than annually, that:
- c. The Permittee has a program in place to reduce the volume and toxicity of hazardous waste generated to the degree determined by the Permittee to be economically practicable; and
 - d. The proposed method of treatment, storage or disposal is the most practicable method available to the Permittee, which minimizes the present and future threat to human health and the environment.
9. With respect to ignitable and reactive wastes, the Permittee shall comply with 40 C.F.R. 264.17, 264.176, and 264.198. With respect to incompatible wastes, the Permittee shall comply with 40 C.F.R. 264.177 and 264.199.
10. The Permittee shall comply with 40 C.F.R. 264 Subparts AA-Air Emission Standards for Process Vents, BB-Air Emission Standards for Equipment Leaks and CC-Air Emission Standards for Tanks, Surface Impoundments and Containers.

Part II Subpart B-Specific Operating Conditions

1. The Permittee is allowed to thermally treat, in the burn pans and popping kettle, only the following hazardous wastes, as described in Table II.A.5-1, Attachment II.A.5 of the March 1996 *Hazardous Waste Facility Construction and Operating Permit Application* and the *Response to the First Notice of Deficiencies*, page 9, dated July 2011:
 - a. Group 1 Propellants. This group includes BALL POWDER™ and materials mixed with the BALL POWDER™. The primary constituents of this group are nitrocellulose, nitroglycerin, nitramines and nitroguanidine.
 - b. Group 2 Devices. These materials consist of spent shell casings, primers, and similar items. Under no circumstances will any lead or lead core bullets be allowed to be treated.
 - c. Group 3 High Explosives. Waste liquid high explosive such as nitroglycerine shall be absorbed on wood flour to reduce the sensitivity prior to treatment.

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2. The Permittee shall not thermally treat more than 1,160 pounds of hazardous material on any single day.
3. The Permittee shall not exceed the batch size of 810 pounds in any one of the burn pans.
4. The Permittee shall comply with waste compatibility requirements of 40 C.F.R. 264.17(b).
5. The Permittee is prohibited from:
 - a. Treating waste streams or waste solvents at the OBU not identified and described in Condition 1 of this Part.
 - b. Treating inert (i.e., non-hazardous) waste at the OBU.
6. The Permittee shall comply with the following requirements prior to thermal treatment:
 - a. The Permittee shall conduct inspections of the OBU on each day of thermal treatment and weekly when the unit is not in operation. The "Open Burn Unit Safety Checklist and Inspection Form (In Attachment 6, Response to the First Notice of Deficiencies dated July 2011) shall be completed during each inspection.
 - b. A waste analysis in accordance with the Attachment II.A.6 of the March 1996 *Hazardous Waste Facility Construction and Operating Permit Application* shall be performed on all waste prior to treatment and on post treatment residue.
 - c. In the event that untreated reactive and/or combustible material is found in the burn pans or popping kettle, it must be re-treated and the treatment method re-evaluated to determine the reason why the initial treatment was not effective.
 - d. Waste shall not be placed on the pad unless the pad has been cleared of residue from the previous thermal treatment event. Residue from a previous event shall be removed and placed into 55-gallon drums for off-site disposal.
 - e. Waste may be placed on the pad only when a thermal treatment event is planned within the next four (4) hours.
7. Thermal treatment may only be accomplished under the following conditions:
 - a. Daylight hours;
 - b. Wind speeds less than or equal to 15 mph;

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- c. No electrical storms within 3 miles of the OBU;
 - d. No forecast of a major storm where local flooding may impact the OBU; and
 - e. No inversion forecast.
8. All of the hazardous waste destined for thermal treatment shall be collected, transported, placed on the burn pad(s) and treated in accordance with the work instructions listed in Standard Operating Procedures, Sub-attachment II.I.1-1 of the March 1996 *Hazardous Waste Facility Construction and Operating Permit Application*. The Daily Hazardous Waste Generation/Treatment form and the Daily Vehicle Inspection Checklist (in Attachment 6, Response to the First Notice of Deficiencies dated July 2011) shall be completed in accordance with the work instructions referenced in this paragraph.
 9. On the day of each scheduled thermal treatment event and prior to transporting the waste to the OBU the Permittee shall:
 - a. Verify and record the meteorological conditions listed in Specific Condition 7 of this Part;
 - b. Inspect the concrete pads for cracks and excess debris;
 - c. Ensure that the remote power switch at the control panel in the shed located outside the thermal treatment area is in the "off" position; and
 - d. Inspect the propane delivery system for deterioration and ensure that the valve leading from the tank to the burn pans and popping kettle is closed.
 10. Thermal treatment of the hazardous waste shall only be conducted by qualified personnel experienced in handling such reactive waste. Training requirements are listed in Attachment II.A.4(e) of the March 1996 *Hazardous Waste Facility Construction and Operating Permit Application*.
 11. The Permittee shall implement appropriate remedial actions for the problems discovered during the inspections conducted pursuant to Specific Condition 6a of this Part. For problems that cannot be remediated within 48 hours, the permitted shall notify the Department within three (3) working days and follow up with a written report within 14 days of discovering such problems. The report must include descriptions of the remedial actions taken. The Permittee shall cease operation of the OBU until completions of the necessary repairs.
 12. The Permittee shall maintain compliance with the environmental performance standards listed in 40 C.F.R. 264.601 at all times.

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Part II Subpart C-Closure Conditions for the Open Burn Unit (OBU)

1. The Permittee shall close the Open Burn Unit in a manner that minimizes or eliminates, to the extent necessary to protect human health and the environment, postclosure escape of hazardous waste, hazardous waste constituents, hazardous waste decomposition products, contaminated leachate or run-off, to the groundwater, surface waters, or to the atmosphere.
2. The Permittee shall have a written closure plan as required by 40 C.F.R. 264.112(a). The closure plan and all revisions to the plan must be kept at the facility until closure is completed, certified in accordance with 40 C.F.R. 264.115, and accepted by the Department.
3. Reserved
4. The Permittee must complete physical closure activities in accordance with the Open Burn Unit Closure Plan dated October 4, 2011.
5. Any changes in the time allowed for closure activities shall require prior written Department approval.
6. The Permittee shall notify the Department 45 days prior to the date on which they expect to begin final closure of a unit.
7. At least 30 calendar days prior to initiating closure activities, the Permittee shall prepare and submit a Closure Activities Report with "schedule date" and "completed" columns to document the progress of closure. Upon Department approval, the Closure Activities Report shall be maintained and updated by the Permittee throughout the closure period, with copies submitted monthly to the Department. Each report must be submitted to the Department by the tenth (10th) day of each month for the preceding month until the acceptance of physical closure by the Department. The schedule for submittal can be changed with written Department approval. These reports can be submitted electronically. Any deviation from scheduled or described tasks shall be fully documented on the checklist.
8. Within 90 days after receiving the final volume of hazardous waste, or upon notification by the Department that closure of a unit is required, the owner or operator must treat or remove all hazardous waste from the unit. The Permittee shall complete closure activities within 180 days after notification to the Department of closure. Any changes in the time allowed for closure of the units after approval shall require prior written Departmental approval.
9. The Permittee shall properly decontaminate or dispose of all equipment, structures, and residues used during or resulting from the closure activities.

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10. The Permittee shall manage all hazardous wastes, residues, sludges, spilled or leaked waste, contaminated liquids and contaminated soils and sediments removed during closure of the unit(s) in accordance with the applicable provisions of 40 C.F.R. Parts 260 through 268, including the manifest requirements. The Permittee should also manage contaminated media in accordance with the Department's August 9, 2006 guidance, *Management of Contaminated Media under RCRA*. A copy of each manifest required as a result of closure activities shall be submitted to the Department with the Closure Certification.
11. The Permittee shall provide notice of field activities in accordance with Subsection 62-780.220(a), F.A.C., by informing the Department at least seven calendar days in advance of any physical closure activity (e.g., decontamination procedures, soil or sediment sampling, soil or sediment removal, etc.).
12. Within 60 calendar days of the completion of closure, the Permittee shall submit to the Department, by certified mail or hand delivery, a Closure Certification report signed by the Permittee and an independent Professional Engineer registered in the State of Florida, stating that the unit has been closed in compliance with the Closure Plan and the conditions of this permit. The Closure Certification must be based on the Professional Engineer's own observation and knowledge of the closure activities. The Closure Certification must include, but not be limited to, the following:
 - a. Sampling data to verify decontamination of materials (e.g., burn pans, popping kettle, concrete containment pad, etc.);
 - b. Copies of manifests or other appropriate shipping documents for removal of all hazardous and solid wastes, contaminated residues or contaminated soils and sediments;
 - c. Groundwater and surface water monitoring data summary pertaining to closure activities (if any);
 - d. A description of final closure activities such as the replacement or repair of the liner system; and
 - e. A final, completed inspection check sheet.
 - f. Any changes or deviations from the approved Closure Plan.
13. The Permittee shall notify the Department as soon as reasonably possible but in no case more than seven calendar days of any determination that actions undertaken as part of closure or associated monitoring programs no longer satisfy the requirements set forth in this permit. If the Department determines that a modification of the permit is required, the Permittee shall, within 60 calendar days, submit an application for a permit modification in accordance with Rule 62-730.290, F.A.C.

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14. The Permittee shall submit an updated Postclosure Plan for the Open Burn Unit in an application for a permit modification in accordance with Rule 62-730.290, F.A.C., at the same time as the Certification of Closure required in Specific Condition 12 of this Part. Post-closure care required by 40 C.F.R. 264.310 for the Open Burn Unit shall commence upon Department approval of the Closure Certification.
15. Within 30 calendar days of submitting a Closure Certification for the Open Burn Unit, the Permittee shall submit to the Department and to the local zoning authority, or the authority with jurisdiction over local land use, a survey plat indicating the type, location, and quantity of hazardous wastes disposed of within the unit with respect to permanently surveyed benchmarks in accordance with 40 C.F.R. 264.116. For hazardous wastes disposed of before January 12, 1981, the owner or operator must identify the type, location, and quantity of the hazardous wastes to the best of his/her knowledge and in accordance with any existing records. This notice is in addition to the requirement to execute a formal land use control (e.g. a restrictive covenant) to obtain a site rehabilitation completion order based on restricted exposure risk assumptions under Chapter 62-780, F.A.C.

PART III-POSTCLOSURE CONDITIONS

Part III Subpart A-General Postclosure Conditions

1. The Permittee shall:
 - a. Never disturb the final cover or any other components of the associated structures unless previous written Department authorization pursuant to 40 C.F.R. 264.117(c) has been received.
 - b. Ensure that all postclosure care activities are conducted in accordance with a Department approved postclosure plan prepared in accordance with 40 C.F.R. 264.118.
2. The Permittee may apply for a shortened postclosure care period in accordance with 40 C.F.R. 264.117(a)(2)(i). However, the Department may also extend the postclosure care period if it is determined that the extended period is necessary to protect human health and the environment in accordance with 40 C.F.R. 264.117(a)(2)(ii).
3. During postclosure, the Permittee shall submit to the Department a completed inspection log describing results of inspections and remedial action taken in maintaining the final cover, containment structures, groundwater monitoring equipment, surveying benchmarks and security devices to comply with 40 C.F.R. 264.117(a).
4. The Permittee shall keep a copy of the postclosure plan and all revisions to the plan at the facility or at another location approved by the Department until postclosure care is completed and certified in accordance with 40 C.F.R. 264.120 and accepted by the Department.

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5. Any proposed amendments to the postclosure plan shall be submitted to the Department for review and written approval.
6. The Permittee shall notify the Department in writing if any damage to the final cover occurs. Damage subject to this notification will be that requiring repair or replacement, not maintenance. Notification describing repairs taken shall be given after damage has been corrected, or within seven calendar days from the date the damage was detected, whichever occurs first. Description of repairs taken shall be submitted in writing to the Department, in any case, within seven calendar days of completion date.
7. Within 60 calendar days from the completion of the established postclosure care period, the Permittee shall submit to the Department by certified mail or hand delivery, a letter signed by the Permittee and an independent Professional Engineer, registered in the State of Florida, stating that the postclosure care for the Hazardous Waste Management Area was performed in accordance with the specifications in the Department approved postclosure plan.

Part III Subpart B-Specific Postclosure Conditions

1. Upon permit issuance, the Permittee shall continue postclosure care for the Old Sludge Pile that began on May 8, 1997 and continue for 30 years (until May 8, 2027) in accordance with 40 C.F.R. 264.117(a) and in accordance with the Old Sludge Pile Post Closure Plan, located in the Response to the First Notice of Deficiencies dated July 2011.
2. The Postclosure Inspection Checklists for the Old Sludge Pile shall be retained at the facility and made available for inspections. If any inspection identifies a condition that requires an action to be taken, the completed checklist identifying the condition and action shall be submitted to the Department within five calendar days.
3. Postclosure care for the Open Burn Unit will begin upon the Department's acceptance of its Certification of Closure.

PART IV-ENVIRONMENTAL MONITORING CONDITIONS

Part IV Subpart A-General Groundwater Monitoring Requirements for OBU and OSP

1. The Permittee shall implement the Sampling and Analysis Plan (SAP) dated November, 2011. The SAP shall be revised, as necessary, in accordance with Paragraph 62-730.220(2)(d), F.A.C.
2. The Permittee shall comply with the general groundwater monitoring requirements of 40 C.F.R. Part 264.97.

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3. The Permittee shall provide notice of field activities in accordance with Subsection 62-780.220(a), F.A.C., by informing the Department at least seven calendar days in advance of groundwater sampling events. Notification should be submitted electronically.
4. The Permittee shall measure groundwater elevations every time any well is sampled. All groundwater elevations must be measured within the same 8-hour period. These data shall be used to determine the groundwater flow direction and calculate the flow rate for each monitoring event.
5. Total depths of all wells must be determined by physical measurement in March of each year to determine if siltation has occurred in any well. The discovery and repair shall be reported to the Department with the Environmental Monitoring Report for that event. Wells must be redeveloped if necessary.
6. The Permittee shall submit Environmental Monitoring Reports in accordance with the schedules in the approved Sampling and Analysis Plan (November, 2011). The Environmental Monitoring Report must contain the following:
 - a. a map showing location of monitoring wells, piezometers, surface water sampling locations, solid waste management units, areas of concern, and waste management areas;
 - b. reports of any necessary repairs or redevelopment of the wells since the last report;
 - c. the Permittee's analysis and evaluation of the current data and comprehensive effectiveness of the monitoring program;
 - d. maps illustrating groundwater flow direction(s), groundwater flow velocities, plume delineation(s) (if any) and a table of groundwater elevation data;
 - e. field logs;
 - f. current laboratory analytical data sheets (electronic copy only); and
 - g. recommendations, if necessary, based on the evaluation of the monitoring programs effectiveness, for modifications to the monitoring program, including the Sampling and Analysis Plan (November, 2011). Modifications may include the addition of new wells, abandonment of existing wells, changes in sampling frequency, or changes in contaminants of concern. Such changes shall not constitute a permit modification. All recommendations must be approved by the Department in writing. Implemented changes shall be included in the subsequent Environmental Monitoring Report.
7. All groundwater sampling shall be conducted in accordance with the site-specific Sampling and Analysis Plan (November, 2011). The Sampling and Analysis Plan (November 2011) will be revised as necessary in accordance with paragraph 62-730.225(2)(d), F.A.C.

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8. Laboratory analytical methodologies must be capable of measuring concentrations of constituents at or below the Groundwater Cleanup Target Levels (GCTLs) listed in Specific Condition Part IV Subpart F.1.
9. All laboratory analysis shall be performed on unfiltered groundwater samples [Subsection 62-520.310(5), F.A.C.]. Analyses on filtered samples may be performed by the facility, for its own use.
10. All laboratory data must be submitted using the ADaPT quality assurance software.
11. All wells within the facility that are not part of the approved groundwater monitoring plan must meet the same security requirements of Specific Condition Part I. 24. All wells beyond the facility boundary must be kept secure and locked when unattended.
12. If future groundwater elevation monitoring indicates a change in groundwater flow direction, the Permittee may be required to install additional monitoring wells and submit revisions to the Sampling and Analysis Plan (November, 2011).
13. In the event a groundwater monitor well is damaged and requires repair (not maintenance), the well shall be repaired before the next sampling event.
14. Groundwater monitoring wells used as part of an approved environmental monitoring program in this permit may be abandoned with Department approval. The Permittee shall abandon monitoring wells in accordance with the requirements of Subsection 62-532.500(4), F.A.C.
15. Within fifteen (15) calendar days of installation of any new monitoring well(s), the Permittee shall submit the following information:
 - a. A completed Water Assurance Compliance System (WACS) information sheet;
 - b. A location map of all new and existing wells with correct orientation, legend and scale;
 - c. A description of protective devices for each well;
 - d. A description of well development procedures and duration of well development;
 - e. A description of the containerization, characterization and disposal of cuttings, drilling muds and fluids, and purge water; and
 - f. Detailed lithologic logs including the description of soils and the classification used, the geologist or geotechnical person responsible for compiling the lithologic logs, the sampling devices, and the sampling intervals.

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Part IV Subpart B-Specific Groundwater Monitoring Requirements for the Open Burn Unit

1. At the time of permit issuance, the Open Burn Unit shall be in detection monitoring under 40 C.F.R. Part 264.98.
2. The Waste Management Area [40 C.F.R. 264.95(b)] shall be designated by an imaginary line circumscribing the miscellaneous unit as indicated in Attachment B of this permit.
3. The Point of Compliance (POC) (40 C.F.R. 264.95(a)) shall be the southwest, southeast and northwest edges of the OBU, as shown on Attachment B of this permit.
4. The POC wells are OLI-1, OLI-2, and OLI-3. The background well is MW-2.
5. The Permittee shall sample monitor wells OLI-1, OLI-2, OLI-3, and MW-2, in March, and September of each year, pursuant to 40 C.F.R. 264.98(d).
6. The Permittee shall sample the monitoring wells as specified in Specific Condition 5 of this Part for all constituents listed in Specific Condition Part IV Subpart F.1. The Permittee shall measure the field parameters pH, temperature, specific conductivity and turbidity.
7. The Permittee shall submit to the Department Environmental Monitoring Reports in accordance with Specific Condition Part IV Subpart A.6 that include information pursuant to Specific Conditions 5, 6, 7, 9, 10, 11, and 12 of this Part. The groundwater monitoring data from the March sampling event shall be submitted no later than the last day of May of that year; and the groundwater monitoring data from the September sampling event shall be submitted no later than the last day of November of that year.
8. If it is determined, by the Permittee, at any time that the maximum concentration limit for any groundwater constituent has been exceeded by the statistically significant amount, the Permittee may demonstrate that a source other than the regulated unit caused the exceedance of the maximum concentration limit, or that the exceedance is an artifact caused by an error in the sampling, analysis, or statistical evaluation or natural variation in the groundwater. In making a demonstration under this paragraph, the permitted must comply with the specifications in 40 C.F.R. Part 264.98(g)(6).
9. If the reports submitted in accordance with Specific Condition 7 of this Part indicate hazardous waste or hazardous constituents have entered the groundwater from the regulated unit, the Permittee shall submit a permit modification to comply with 40 C.F.R. Part 264.98(g)(4) within 90 days. The permit modification shall include a corrective action program in accordance with 40 C.F.R. Part 264.100 along with a proposed monitoring program which must be as effective as that program in determining compliance with the groundwater protection standard and the compliance monitoring program in accordance with 40 C.F.R. Part 264.99 and 264.100(d). The Permittee shall also comply with Subsections 62-4.050(7) and 62-730.290(4), F.A.C.

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Part IV Subpart C-General Surface Water Monitoring Requirements for the Open Burn Unit

1. The Permittee shall implement the Sampling and Analysis Plan (SAP) dated November 2011. The SAP shall be revised, as necessary, in accordance with Paragraph 62-730.220(2)(d), F.A.C.
2. The Permittee shall provide the Department with opportunities to observe surface water sampling and split samples by providing notification electronically at least seven (7) calendar days prior to each sampling event.
3. The Permittee shall submit Environmental Monitoring Reports in accordance with the schedules in the approved Sampling and Analysis Plan (November, 2011). The Environmental Monitoring Report must contain the following:
 - a. a map showing the location of monitoring wells, piezometers, surface water sampling locations, solid waste management units, areas of concern, and waste management areas;
 - b. the Permittee's analysis and evaluation of the current data and comprehensive effectiveness of the monitoring program;
 - c. maps illustrating surface water flow direction(s) and a table of surface water elevation data;
 - d. field logs;
 - e. current laboratory analytical data sheets (electronic copy only); and
 - f. recommendations, if necessary, based on the evaluation of the monitoring programs effectiveness, for modifications to the monitoring program, including the Sampling and Analysis Plan (November, 2011). All recommendations must be approved by the Department in writing. Implemented changes shall be included in the subsequent Environmental Monitoring Report.
4. All surface water sampling shall be conducted in accordance with the site-specific Sampling and Analysis Plan (November 2011).
5. Sampling methodologies must be capable of measuring concentrations of constituents at or below the Surface Water Cleanup Target Levels (SWCTLs) listed in Specific Condition Part IV Subpart F.3.

Part IV Subpart D-Specific Surface Water Monitoring Requirements for the Open Burn Unit

1. Surface water sampling locations shall be OSW-1, OSW-2 and OSW-3 and the background sampling location shall be OSBG-1 as shown on Attachment B.

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2. Permittee shall sample all sampling locations specified in Specific Condition 1 of this Part in March, and September of each year.
3. The Permittee shall sample each sampling location for the parameters in Specific Condition Part IV Subpart F.3. The Permittee shall also measure pH, temperature, specific conductivity and turbidity.
4. The Permittee shall submit the surface water results pursuant to Specific Conditions 2 of this Part with the Environmental Monitoring Report required by Specific Condition IV Subpart A.6.
5. If it is determined by the Permittee, at any time that the maximum concentration limit for any surface water constituent has been exceeded, the operations for the OBU shall immediately cease, except as specified by Specific Condition 6 of this Part. The Permittee shall then determine the reason for the exceedances and submit a report including these reasons as well as a contingency plan describing preventative measures to be taken in the future to prevent further contamination and pollution. Also, the sampling location shall be resampled. If an exceedance is confirmed during resampling, then the exceedance shall be a violation of the permit and a violation of Florida Statute Section 403.161(1)(a).
6. If it is determined, by the Permittee, at any time that the maximum concentration limit for any surface water constituent (Specific Condition 5 of this Part) has been exceeded, the Permittee may demonstrate that a source other than the regulated unit caused the exceedance of the maximum concentration limit, or that the exceedance is an artifact caused by an error in sampling, analysis, or natural variation in the surface water.

Part IV Subpart E-Specific Groundwater Monitoring Requirements for the Old Sludge Pile at Waste Management Area 1

1. At the time of permit issuance, the Old Sludge Pile shall be in detection monitoring under 40 C.F.R. Part 264.98.
2. Waste Management Area 1 (WMA1) for Postclosure shall be designated by an imaginary line circumscribing the Old Sludge Pile [40 C.F.R. Part 264.95(b)] (Attachment C). The Point of Compliance for Waste Management Area 1, at the time of permit issuance, shall be the western and southern boundaries of Old Sludge Pile [40 C.F.R. Part 264.95(a)].
3. The Point of Compliance shall be the southern boundary of the Waste Management Area.
4. The Point of Compliance (POC) wells for Old Sludge Pile shall be MW-24, and MW-25. The background well for Old Sludge Pile shall be MW-8 (Attachment C).
5. The Permittee shall sample all wells specified in Specific Condition 4 of this Part, in March of each year until the Department accepts certification of Postclosure for WMA1.

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6. The hazardous constituents to be sampled for are 2,6-dinitrotoluene, 2,4-dinitrotoluene and lead. Field parameters shall include pH, temperature, specific conductivity and turbidity.
7. If hazardous constituents are detected in a monitoring well, the Permittee shall notify the Department in writing (electronic notification is acceptable) and the monitoring well will be re-sampled within 45 days of receipt of the analytical results. The Permittee shall provide the results to the Department within 30 days of receipt of the results.
8. The Permittee shall submit to the Department Environmental Monitoring Reports that include information pursuant to Specific Conditions of this Part. The groundwater monitoring data from the March sampling event shall be submitted no later than the last day of May of that year.
9. The facility may at any time propose a modification to the permit to incorporate an appropriate statistical procedure to demonstrate that any exceedance of Groundwater Cleanup Target Levels (GCTLs) (Specific Conditions Part IV Subpart F.1) were not caused by migration of hazardous constituents from WMA1 (40 C.F.R. Part 264.97(h) and 40 C.F.R. Part 264.98(g)(6)).
10. The Permittee shall measure groundwater elevations for monitoring wells MW- 8, MW-9, MW-10, MW-11, MW-16, MW-17, MW-18, MW-24, and MW-25 within an 8-hour period on an annual basis in March.

Part IV Subpart F-Cleanup Target Levels

1. The Groundwater Cleanup Target Levels (GCTLs) for these contaminants of concern will be as follows:

Analyte	GCTL (µg/l)
Benzene	1
Diphenylamine	180**
Lead	15
Methylene Chloride	5
N-Nitrosodiphenylamine	7.1**
Nitrocellulose	*
Nitrate	10,000
Nitrite	1,000
Nitroglycerin	*
2,4-Dinitrotoluene (2,4-DNT)	0.05**

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2,6-Dinitrotoluene (2,6-DNT)	0.05**
Hexahydro-1,3,5-trinitro-1,3,5-triazine(RDX)	0.3**
Octahydro-1,3,5,7-tetranitro-1,3,5,7tetrazocine (HMX)	350**
µg/l = microgram per liter	

* = Practical Quantitation Limit (PQL) or background, whichever is greater. The PQL is the lowest level that can be reliably measured during routine laboratory operating conditions within specified limits of precision and accuracy in accordance with the analytical methods provided in the Sampling and Analysis Plan dated November 2011.

** = Contaminant Cleanup Target Levels in Chapter 62-777, F.A.C.

- The Department may modify this permit to reflect changes in Groundwater Cleanup Target Levels based on most current information, unless a remedy is designed and approved.
- The surface water cleanup target levels for these contaminants of concern will be as follows:

Analyte	(µg/l)
Benzene	71.28 annual average
Diphenylamine	Background*
Lead	**
Methylene Chloride	1580
N-Nitrosodiphenylamine	44***
Nitrocellulose	Background*
Nitrate	****
Nitrite	****
Nitroglycerin*	Background*
2,4-Dinitrotoluene (2,4-DNT)	9.10*****
2,6-Dinitrotoluene (2,6-DNT)	4***
Hexahydro-1,3,5-trinitro-1,3,5-triazine(RDX)	180***
Octahydro-1,3,5,7-tetranitro-1,3,5,7tetrazocine (HMX)	1250***

* In accordance with subsection 62-302.200(3) F.A.C., background is defined as the condition of waters in the absence of the activity or discharge under consideration, based on the best scientific information available to the Department.

** Based upon hardness per Chapter 62-302, F.A.C.

*** Contaminant Cleanup Level per Chapter 62-777, F.A.C.

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**** In accordance with Rule 62-302.530, F.A.C., in no case shall nutrient concentrations of a body of water be altered so as to cause an imbalance in natural populations of aquatic flora and fauna.

***** Annual average = the maximum average concentration at average annual flow conditions.

PART V-CORRECTIVE (REMEDIAL) ACTION CONDITIONS

1. The Conditions of this Part apply to:
 - a. The SWMUs and AOCs identified in Appendix A;
 - b. Any additional SWMUs or AOCs discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means; as used in this Part of the permit, the terms “discover”, “discovery”, or “discovered” refer to the date on which the Permittee either:
 - (1) visually observes evidence of a new SWMU or AOC;
 - (2) visually observes evidence of a previously unidentified release of contaminant(s) to the environment; or
 - (3) receives information from a credible source of the presence of a new release of contaminant(s) to the environment; and
 - c. Contamination that has migrated beyond the facility boundary, if applicable.
2. Within 15 calendar days of discovery, the Permittee shall notify the Department in writing of any newly discovered release(s) of contaminant(s) to the environment; any suspected new AOC(s); and any additional SWMU(s) discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means. The notification shall include, at a minimum, the location of the release, AOC or SWMU (hereinafter referred to collectively as “site”), and all relevant information (e.g., location of site(s) on a topographic map of appropriate scale; general dimensions of affected area; media affected; hazardous constituents released; and magnitude of release). The Department may conduct, or require that the Permittee conduct, confirmatory sampling to determine whether contamination is present. The Department will notify the Permittee in writing of the final determination as to the status of the newly discovered or suspected site.
3. Upon notification by the Department, the Permittee shall prepare and submit a Confirmatory Sampling (CS) Work Plan for known, suspected, or newly discovered sites. Unless the notification letter specifically establishes a different time frame for work plan

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submittal, the Work Plan shall be submitted within 60 calendar days of notification by the Department that a CS Work Plan is required. The CS Work Plan shall include schedules for implementation and completion of specific actions necessary to determine whether or not contamination has occurred in any potentially affected media. Previously existing data may be submitted with the work plan for the Department's consideration to partly or wholly satisfy the CS requirement.

4. In accordance with the schedule in the approved CS Work Plan, or no later than 60 calendar days after receipt of the Department's written approval of a CS Work Plan, if no schedule is included in the Work Plan, the Permittee shall submit a CS Report identifying the site(s) and contaminated media or a determination that contamination was not found. The CS Report shall include the analytical data and a comparison to applicable regulatory criteria to support all determinations. Based on the results of the CS Report, the Department will determine the need for further investigation at the site(s) covered in the CS Report and notify the Permittee in writing.
5. De Minimis discharge is a release of contaminant(s) that is removed from the soil, sediment, surface water, and groundwater to cleanup target levels or background concentrations within 30 days of discovery of the release. If the Permittee intends to treat a discharge under the De Minimis discharge provision of Rule 62-780.550, F.A.C., the Permittee must meet the notification requirements of Condition 2 of this Part, notifying the Department that a De Minimis action is underway. A De Minimis Remediation Report must be submitted to the Department within 90 days of discovery of the release. The report must include a description of all actions taken in response to the discharge and the information required by the Interim Source Removal Report pursuant to Paragraph 62-780.500(7)(a), F.A.C.
6. Upon notification by the Department, the Permittee shall commence site rehabilitation in accordance with Rule 62-730.225 and Chapter 62-780, F.A.C., for all SWMUs and/or AOCs ("contaminated sites") identified in the notification. Unless the notification letter specifically establishes a different time frame to commence or complete site assessment, the Permittee shall commence and complete site assessment in the manner and within the time limits set forth in Rule 62-780.600, F.A.C.
7. Upon notification by the Department, the Permittee shall submit to the Department an Interim Measures (IM) Work Plan for any release, SWMUs or AOCs that the Department determines necessary to minimize or prevent further migration of contaminants or to limit human or environmental exposure to contaminants. The IM Work Plan shall be designed to mitigate any current or potential threat(s) to human health or the environment and to be consistent with long-term corrective actions at the facility. The IM Work Plan shall include the IM objectives, procedures for implementation, a schedule of activities, and associated designs, plans, and specifications.
8. If the Department or the Permittee at any time determines that any approved work plan no longer satisfies the requirements of 40 C.F.R. 264.101 or this permit for prior or continuing

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releases of contaminant(s) to the environment, the Permittee shall submit an amended work plan to the Department within 60 calendar days of such determination.

PART VI-REMEDY SELECTION AND IMPLEMENTATION

Part VI Subpart A-General Conditions

1. Within 90 calendar days of Department approval of a Site Assessment Report or Site Assessment Report Addendum the Permittee shall submit a Remedial Action Plan developed in accordance with Chapters 62-780 and 62-730, F.A.C. Remedial Action Plans may be performance based and include a contingent remediation option(s) that may be implemented based on changing conditions at the site.
2. Within 30 days of Department written approval of the remedial alternative(s) selected, the Permittee shall publish notice of a proposed permit modification in accordance with Rule 62-730.292(3)(c), F.A.C. This modification will serve to incorporate a final remedy into this permit. Final approval of remedial action which is achieved through interim measures shall be in accordance with this condition.
3. The Remedial Action Plan shall include a provision for the Permittee to submit periodic Remedial Action Status Reports in accordance with Subsection 62-780.700(13). The intent to implement a different approved contingent remedy in a performance-based Remedial Action Plan can be provided in the Remedial Action Status Report. Proposals to modify a previously approved remedy in a performance based Remedial Action Plan can be provided in the Remedial Action Status Report and implemented with written approval by the Department.
4. When site rehabilitation (remedial action) is complete, the Permittee shall submit to the Department a Site Rehabilitation Completion Report in accordance with Chapter 62-780, F.A.C. Site Rehabilitation Completion Reports can be part of a combined document with the Remedial Action Status Report.
5. For site rehabilitation involving the cleanup of groundwater contaminated by a release from a designated regulated unit, the Permittee must demonstrate that the concentration of constituents of concern remain below cleanup goals for three consecutive years after active remediation has ceased as per 40 C.F.R. 264.100(f).
6. When appropriate, the Department will approve completion of site rehabilitation by inclusion in a permit renewal, permit modification, or separate Site Rehabilitation Completion Order.

Part VI Subpart B-Selected Remedies

1. Soil containing lead and arsenic at concentrations exceeding direct exposure commercial/industrial standards was excavated the week of February 11-25, 2008. This

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excavation was reported in the *Interim Measure Completion, Solid Waste Management Units 21 and 23, St. Marks Powder, St. Marks, Wakulla County, Florida* dated August 2008. The selected remedy for SWMUs 21- Covered Scrap Ditches and 23- Scrap Metal Decontamination Area is active groundwater pumping with subsequent treatment of contaminated groundwater in the facility's Wastewater Treatment Facility as described in the *Groundwater Recovery System for Diphenylamine, Solid Waste Management Units 21 and 23* dated July 22, 2011.

2. The *Annual Groundwater Monitoring Plan* dated April 4, 2008 requires groundwater monitoring for Lift Station 7, SWMU 28- Nitroglycerin Spill Area, SWMU 37- Decontamination Area and SWMU 40-Pack Cleaning Interim Storage.
3. The *Declaration of Restrictive Covenant* dated October 15, 2009 places institutional controls on AOC A-Combustible Fibers Test Unit, SWMU 21-Covered Scrap Ditches, SWMU 23-Scrap Metal Decontamination Area, SWMU 28- Nitroglycerin Spill Area, SWMU 37- Decontamination Area, SWMU 40-Pack Cleaning Interim Storage, SWMU 45 Acid Spill Area (Nitroglycerin Facility) and the Old Sludge Pile.

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Appendix A
Summary of Facility Sites (Solid Waste Management Units and Areas of Concern)

A.1. List of SWMUs/AOCs requiring Confirmatory Sampling:				
SWMU/AOC Number/Letter	SWMU/AOC Name	SWMU/AOC Comment and Basis for Determination	Dates of Operation	Potentially Affected Media
There are no units identified as requiring Confirmatory Sampling at this time pursuant to this permit.				
A.2. List of SWMUs/AOCs requiring a Site Assessment (a/k/a RCRA Facility Investigation [RFI]) or a Risk Assessment:				
SWMU/AOC Number/Letter	SWMU/AOC Name	SWMU/AOC Comment	Dates of Operation	Potentially Affected Media
There are no units identified at this time as requiring a Site or Risk Assessment.				
A.3. List of SWMUs/AOCs requiring a Remedial Action Plan or Natural Attenuation with Monitoring Plan (a/k/a Corrective Measures Study [CMS]):				
SWMU/AOC Number/Letter	SWMU/AOC Name	SWMU/AOC Comment	Dates of Operation	Affected Media
There are no units identified at this time requiring a Remedial Action Plan or a Natural Attenuation with Monitoring Plan.				
A.4. List of SWMUs/AOCs implementing a Remedial Action Plan or Natural Attenuation with Monitoring Plan (a/k/a Corrective Measures Implementation Report [CMI]):				
SWMU/AOC Number/Letter	SWMU/AOC Name	SWMU/AOC Comment	Dates of Operation	Affected Media
AOC A	Combustible Fiber Test Unit	Declaration of Restrictive Covenant dated October 15, 2009	1991	Soil

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SWMU 21	Covered Scrap Ditches	Interim Measures for Soils dated August 2008; GW Recovery System for Diphenylamine, July 22, 2011	1970-1976	Groundwater
SWMU 23	Scrap Metal Decontamination Area	Interim Measures for Soils dated August 2008; GW Recovery System for Diphenylamine, July 22, 2011	1970-Present	Soil & groundwater
SWMU 45	Acid Spill-Nitroglycerin Facility	DEP approval of NFA with LUCs on October 7, 2008 and Declaration of Restrictive Covenant dated October 15, 2009	2007	Soil

A.5. List of SWMUs/AOCs at which Site Rehabilitation Completion Determinations without controls have been made:

SWMU/AOC Number/Letter	SWMU/AOC Name	Unit Comment and Basis for NFA	Dates of Operation

There are no units identified at this time at which Site Rehabilitation Completion Determinations without controls have been made.

A.6. List of SWMUs/AOCs at which Site Rehabilitation Completion Determinations with controls have been made:

SWMU/AOC Number/Letter	SWMU/AOC Name	Unit Comment and Basis for NFA	Dates of Operation

There are no units identified at this time at which Site Rehabilitation Completion Determinations with controls have been made.

A.7. List of SWMUs/AOCs Where No Further Action Determinations have been made based on no suspected or confirmed contamination:

SWMU/AOC	SWMU/AOC	Unit Comment	Letter Date of

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Number/Letter	Name	and Basis for NFA	Basis
SWMU 1	Closed Waste Pile	Closure certification dated January 28, 1983	DER acceptance on February 9, 1984
SWMU 2	Covered Explosive-Contaminated Debris Ditches	Corrective Measures Sampling Report approval	March 5, 2001
SWMU 3	MK 24 Powder Can Temporary Storage	RFA	June 1995
SWMU 4	Hazardous Waste Incinerator	Clean Closure Certification dated December 6, 1993	DER acceptance of Clean Closure Certification on February 3, 1994
SWMU 5	Sludge Drying Beds (WMA 1)	Closure certification dated November 12, 1996	DER acceptance on December 23, 1996
SWMU 6	Old WWTP Sludge Pile (Post-closure)	Regulated unit with postclosure under this permit	
SWMU 7	New WWTP Sludge Pile (At Facility closing the site will be revisited for vanadium)	CMS dated April 26, 2006	September 11, 2006
SWMU 8	WWTP Polishing Pond (WMA 1)	Closure certification dated November 12, 1996	DER acceptance on December 23, 1996
SWMU 9	Wastewater Treatment Plant (WWTP) Irrigation Field	Amendment to RCRA CSR dated January 16, 2001	March 5, 2001
SWMU 10	WWTP Solids Separator Tanks A, B and C	RFA	June 1995
SWMU 11	Equalization Tank	RFA	June 1995
SWMU 12	WWTP Aeration Tank	RFA	June 1995
SWMU 13	WWTP Clarifiers A and B	RFA	June 1995
SWMU 14	WWTP Chlorination tank	RFA	June 1995
SWMU 15	WWTP Digester tank	RFA	June 1995
SWMU 16	WWTP Filter Press	Amendment to RCRA CSR dated January 16, 2001	March 5, 2001

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SWMU 17	Covered WWTP Sludge Ditch	CMS dated April 26, 2006	September 11, 2006
SWMU 18	North Domestic Waste Ditch	Amendment to RCRA CSR dated January 16, 2001	March 5, 2001
SWMU 19	South Domestic Waste Ditch	Amendment to RCRA CSR dated January 16, 2001	March 5, 2001
SWMU 20	North and South Storage Ditches	Amendment to RCRA CSR dated January 16, 2001	March 5, 2001
SWMU 22	Scrap Fiber Packs	RFA	June 1995
SWMU 24	Drum Storage Area	RFA	June 1995
SWMU 25	Decontamination Scrap Metal Ditches	Amendment to RCRA CSR dated January 16, 2001	March 5, 2001
SWMU 26	Open Burning Unit (Operating Unit)	Operation and closure of this unit is under this permit	September 17, 1996
SWMU 27	WWTP Dredge Disposal Area (WMA 2)	Closure certification dated November 12, 1996	DER acceptance on December 23, 1996
SWMU 29	Boneyard	RFA	June 1995
SWMU 30	North Sweetie Barrel Emergency Overflow Containment Pond	RFA	June 1995
	North Sweetie Barrel Emergency Overflow Containment Pond (broken pipe release)	Summary of the investigation and remedial measures dated February 3, 2003	DEP acceptance of NFA dated November 28, 2011
SWMU 31	Wet Line Building Floor Drains and Sumps	Amendment to RCRA CSR dated January 16, 2001	March 5, 2001
SWMU 32 A-F	Facility Lift Stations and Sewer Lines	Amendment to RCRA CSR dated January 16, 2001	March 5, 2001
SWMU 33	Central Lift Station-Emergency Overflow Containment Pond	Amendment to RCRA CSR dated January 16, 2001	March 5, 2001
SWMU 34	NPDES Outfall Discharge	RFA	June 1995

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	Ditch		
SWMU 35	North Coater Building Floor Sumps and Trenches	Amendment to RCRA CSR dated January 16, 2001	March 5, 2001
SWMU 36	Powder Pit Sand table Operation Sumps	Amendment to RCRA CSR dated January 16, 2001	March 5, 2001
SWMU 39	Combustible Fiber Product (CFP) Non-Hazardous Waste Roll-Off	RFA	June 1995
SWMU 41	CFP Contaminated Scrap Pad	CMS dated April 26, 2006	DEP acceptance of CMS on September 11, 2006
SWMU 42	CFP Explosive Scrap Pad	Interim Measure Completion Report for SWMUs 37, 40 and 42 dated August 30, 2002	DEP acceptance on January 8, 2003
SWMU 43 A-F	Waste Accumulation Areas	RFA	June 1995
SWMU 44	Quality Assurance Laboratory Sinks	Amendment to RCRA CSR dated January 16, 2001	EPA acceptance on March 5, 2001

A.8. List of SWMUs/AOCs with Monitoring Only Plans:

SWMU/AOC Number/Letter	SWMU/AOC Name	SWMU/AOC Comment	Dates of Operation	Affected Media
SWMU 28	Nitroglycerine Spill Area	No soil sampling due to safety hazard; groundwater monitoring only	1970	Soil
SWMU 32D	Lift Station 7 (Dry Line)	September 27, 2001, Investigation of Lift Station 7	1970-Present	Groundwater

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SWMU 37	Decontamination Area Near Warehouse	Interim Measures Completion (Soil) removal, August 30, 2002	1971-Present	Soil
SWMU 40	Pack Cleaning Interim Storage	Interim Measures Completion (Soil) removal, August 30, 2002	1987-1993	Soil

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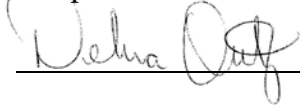
STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



JOHN A. COATES, P.E. CHIEF
BUREAU OF SOLID AND HAZARDOUS WASTE

Filing and Acknowledgment

Filed on this date, pursuant to Section 120.52, Florida Statutes, with the designated Clerk,
receipt of which is acknowledged.



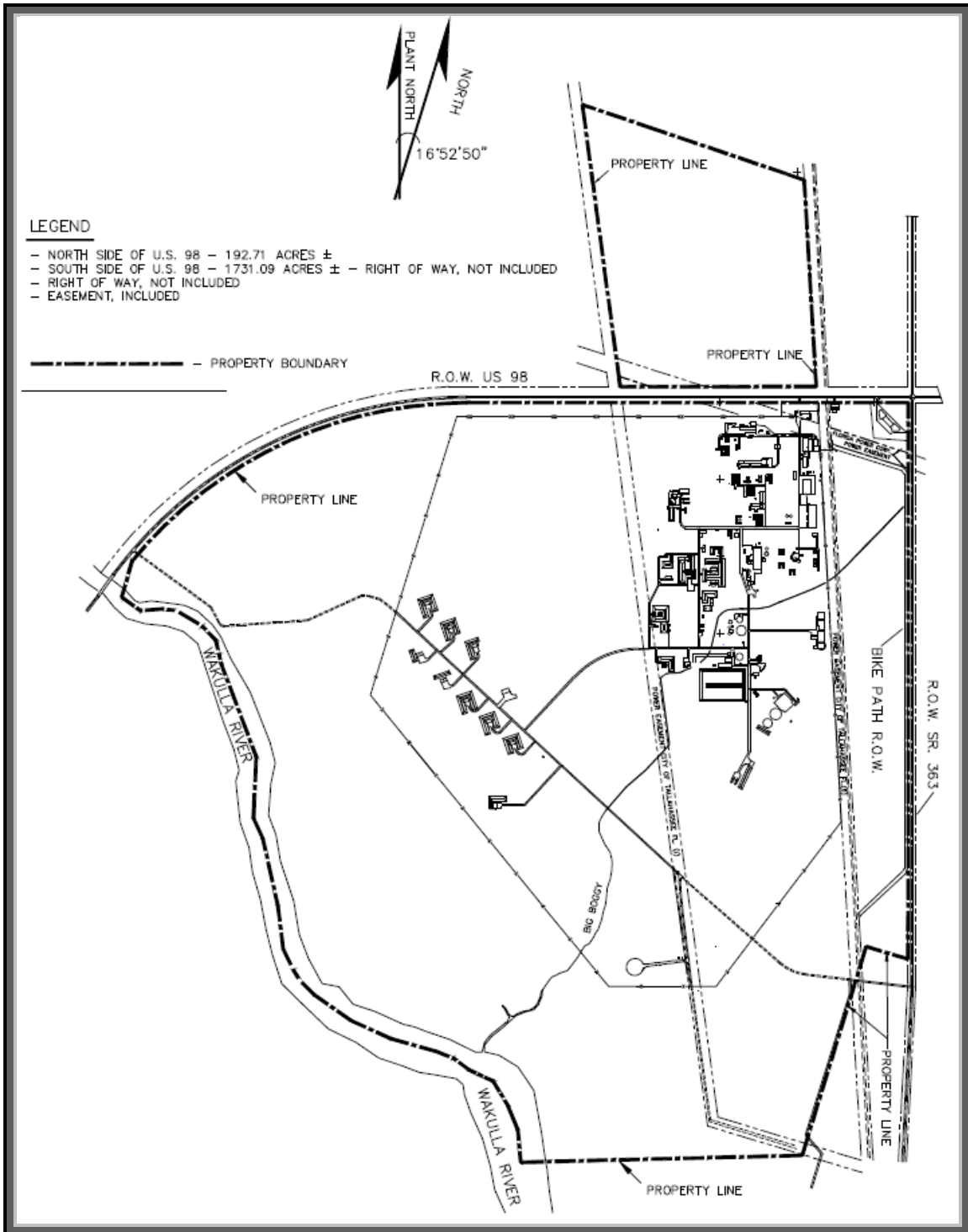
CLERK

February 3, 2012
DATE

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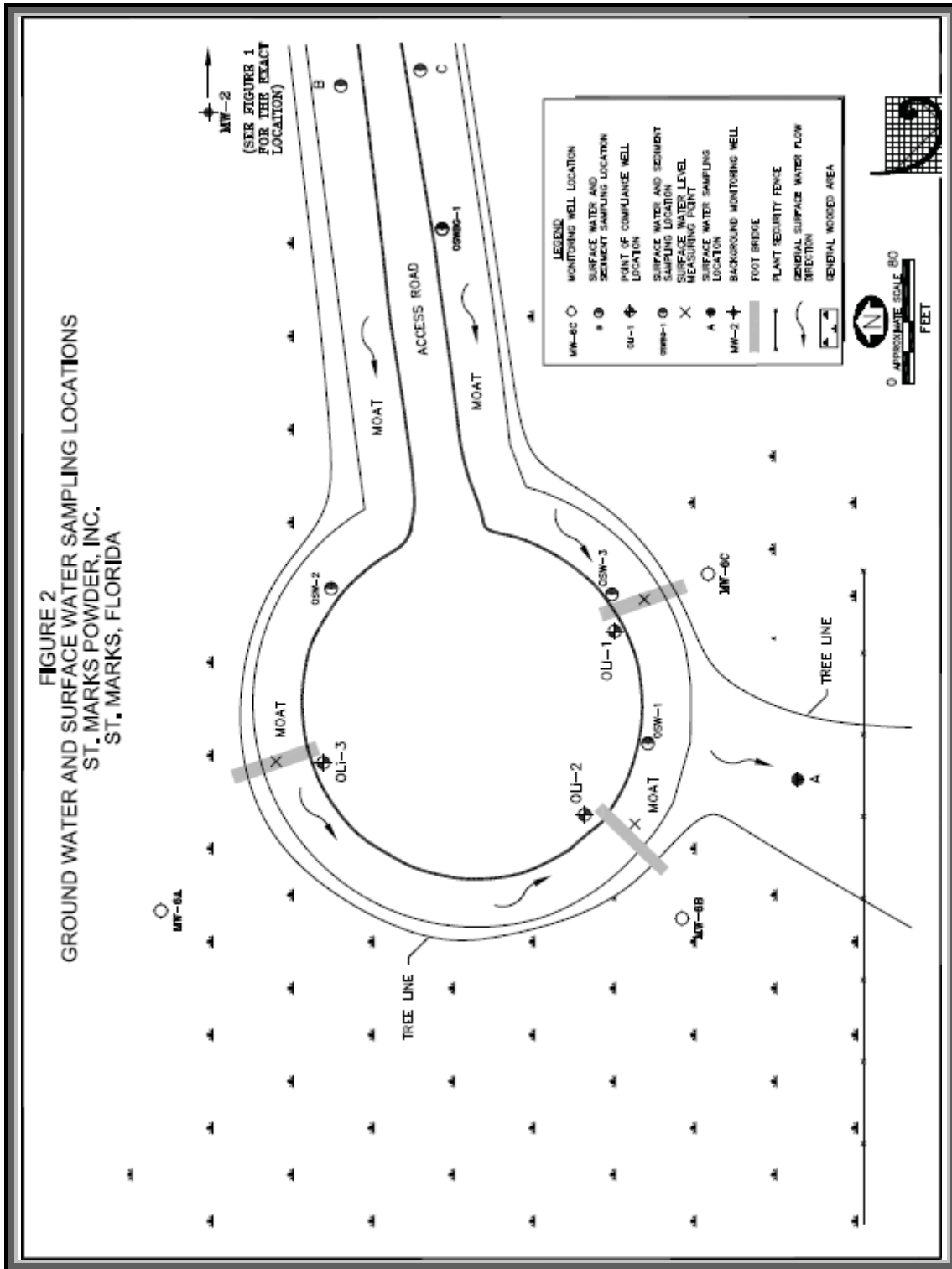
Attachment A-Facility Map



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Attachment B-Open Burn Unit



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Attachment C-Waste Management Area 1 (WMA-1)

