

File



# Department of Environmental Protection

Lawton Chiles  
Governor

Northeast District  
7825 Baymeadows Way, Suite B200  
Jacksonville, Florida 32256-7590

Virginia B. Wetherell  
Secretary

October 23, 1995

Mr. Richard Maguire  
Rogers, Towers, Bailey, Jones, and Gay  
1301 Riverplace Boulevard  
Suite 1500  
Jacksonville, FL 32207

Dear Mr. Maguire:

North Florida Shipyards, Inc. - Commodores Point  
FLD 982 121 329  
State Investigation No. 91-20752 & OGC #94-3291  
Duval County - Hazardous Waste

The Department has reviewed ViroGroup's October 10, 1995 Preliminary Contamination Assessment Report (PCAR) for the above referenced facility. From the data presented, it appears that Florida Drinking Water Standards have not been exceeded. In addition, contaminant concentrations in the soil are below current Department residential soil cleanup goals and do not exhibit significant leaching potential. Therefore, no further action is required for this facility at this time.

If there are any questions or comments concerning this letter, please contact me at the letterhead address or call (904)448-4320, extension 381.

Sincerely,

*Stanley Tam*  
Stanley Tam  
Hazardous Waste Engineer

ST:st

cc: John Shiffert, North Florida Shipyards  
Jim Oliveros, ViroGroup

HG  
VW  
SCT

DEPARTMENT OF ENVIRONMENTAL PROTECTION

INTEROFFICE MEMORANDUM

To: \_\_\_\_\_  
To: \_\_\_\_\_  
To: \_\_\_\_\_  
To: \_\_\_\_\_

NORTHEAST DISTRICT - JACKSONVILLE

TO: Ashwin Patel - Hazardous Waste Section  
THROUGH: Brian Cheary - Waste Cleanup Section (HC)  
FROM: Brian Kelley - Waste Cleanup Section BK  
DATE: October 18, 1995  
SUBJECT: Preliminary Contamination Assessment Report (PCAR)  
North Florida Shipyards, Inc.  
Commodores Point Facility - Duval County

I have completed review of the October 10, 1995 PCAR submitted for the referenced facility. The data presented indicates no violations of Drinking Water Standards. Additionally, contamination concentrations in soil are below current residential soil cleanup goals and do not exhibit a significant leaching potential. Based on this information, no further action is required at this time.

BKK:hg

ROGERS, TOWERS, BAILEY, JONES & GAY

A PROFESSIONAL ASSOCIATION  
ATTORNEYS AT LAW  
1301 RIVERPLACE BOULEVARD  
SUITE 1500  
JACKSONVILLE, FLORIDA 32207

TELEPHONE (904) 398-3911  
FAX (904) 396-0663

WM. H. ROGERS - 1884-1967  
CHARLES D. TOWERS - 1894-1969  
CECIL C. BAILEY - 1901-1992  
TAYLOR JONES - 1911-1982  
J. EDWIN GAY - 1909-1994  
CLYDE A. REESE, JR. - 1934-1995

RECEIVED  
NOV 13 1995

DELAHASSEE, FLORIDA

106 SOUTH MONROE STREET  
P.O. BOX 1872  
TALLAHASSEE, FLORIDA 32302  
(904) 222-7200  
FAX (904) 222-7204

FRANK L. JONES

GOVERNMENTAL CONSULTANT:  
MARVIN ARRINGTON

SPECIAL COUNSEL  
HOWARD I. KORMAN  
ALFRED J. POMERANZ

WRITER'S DIRECT DIAL NUMBER:

(904) 346-5564

CHARLES D. TOWERS, JR.  
JAMES M. McLEAN  
FRED M. RINGEL  
DAVID M. FOSTER  
C. WILLIAM REINEY  
ALLAN T. GEIGER  
G. KENNETH NORRIE  
DOUGLAS A. WARD  
PAUL P. SANFORD  
IRVIN M. WEINSTEIN  
ROBERT T. HYDE, JR.  
H. JOSEPH O'SHIELDS  
DONALD C. WRIGHT  
JOSEPH O. STROUD, JR.  
RICHARD B. SCHWALBE  
MICHAEL A. WODRICH  
CECILE EVANS RIDER  
E. ALLEN HIEB, JR.  
J. KIRBY CHRITTON  
T.R. HAINLINE, JR.  
JEFFREY C. REGAN  
CHRISTOPHER C. HAZEUP

SUSAN C. McDONALD  
BETSY COX MAHIN  
ANTHONY A. ANDERSON  
MARCIA PENMAN PARKER  
ANNE K. BUZBY  
KURT H. DUNKLE  
RICHARD L. MAGUIRE  
JAMES M. RILEY  
MARK M. ARNOLD  
C. DAVIS ELY  
RICK MONTE REZNICSEK  
WILLIAM A. O'LEARY  
REGINA ALBERINI YOUNG  
EMILY G. PIERCE  
GREGORY F. LUNNY  
JOHN R. IBACH  
CHERYL L. WORMAN  
MARGARET M. BURNETT  
SANDRA J. MATHIS  
DAVID E. GARDNER  
GILBERT L. FELTEL, JR.

November 10, 1995

Ms. Roberta J. Tylke,  
Assistant State Attorney  
Fourth Judicial Circuit of Florida  
Special Prosecution Division  
421 West Church Street - Suite 814-21  
Jacksonville, FL 32202-4157

Handwritten initials: PDP, VAV, PF, SFT, RC, KB, RC

RE: North Florida Shipyards, Inc.,  
Recalculation of Penalty  
Modification to Deferred Prosecution Agreement  
Our File No: N0127-14972

Dear Ms. Tylke:

I appreciate your response to, and consideration of, our request to reduce the penalty assessed against North Florida Shipyards, Inc. (NFSI) in this matter. While I see no need for a lengthy series of correspondence concerning the matter, I do believe two points should be clarified concerning the calculation of the penalty assessed.

First, we do not agree that the penalty assessed was no greater than a penalty that would have been assessed as a purely civil matter. While there was lengthy discussions over the penalty amount, NFSI agreed to penalties for certain violations that the company may not have agreed to if the issue had been purely settlement of a civil enforcement action. NFSI was required to consider the significant business and economic impacts of any criminal trial. Also, the terms of the Deferred Prosecution agreement are certainly more burdensome than those of a civil consent order.

Second, you are correct that the original penalty sought was substantially higher. However, I believe that the reduction in that penalty resulted from the application of the penalty guidelines, and not through any "trading." I am unaware of any penalties for violations that were reduced because NFSI agreed to a higher amount on another violation. I am and was convinced that the penalty was calculated by the Department of Environmental Protection representatives, including Ms. Valade, by a strict application of the

ROGERS, TOWERS, BAILEY, JONES & GAY

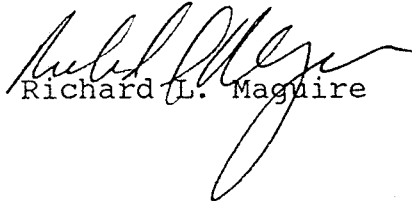
Ms. Roberta J. Tylke  
November 10, 1995  
Page 2

penalty guidelines. Ms. Valade's non-objection to the requested reduction in the penalty is confirmation of that fact.

I understand that the State Attorney's office had and has the discretion to insist upon a higher penalty, unconnected to the penalty guidelines. However, since those penalty guidelines were used to determine the penalty, it seems appropriate to continue to follow the same procedures now.

Again, I appreciate your consideration. If you have any questions, please do not hesitate to contact me.

Sincerely,

  
Richard L. Maguire

RLM/gmc

cc: Mr. Joe Shiffert  
Mr. John B. Shiffert  
Ms. Vicki Valade



# Department of Environmental Protection

Lawton Chiles  
Governor

Northeast District  
7825 Baymeadows Way, Suite B200  
Jacksonville, Florida 32256-7590

Virginia B. Wetherell  
Secretary

May 9, 1995

Mr. Richard Maguire  
Rogers, Towers, Bailey, Jones, and Gay  
1301 Riverplace Boulevard  
Suite 1500  
Jacksonville, FL 32207

Dear Mr. Maguire:

North Florida Shipyards, Inc. - Commodores Point  
FLD 982 121 329  
OGC #91-20752  
Duval County - Hazardous Waste

The Department has reviewed ViroGroup's April 28, 1995 response on behalf of North Florida Shipyards to the Department's comments on the Commodores Point facility's Preliminary Contamination Assessment Plan (PCAP) addendum. As discussed in our meeting today, the Department finds the responses satisfactory. Therefore, the Department hereby grants permission to implement the revised PCAP.

If there are any questions or comments concerning this letter, please contact me at the letterhead address or call (904)448-4320, extension 381.

Sincerely,  
*Stanley Tam*  
Stanley Tam  
Hazardous Waste Engineer

*ST*  
ST:st

cc: John Shiffert, North Florida Shipyards  
Jim Oliveros, ViroGroup

City of Jacksonville  
Fire and Rescue Department  
Emergency Preparedness  
107 N. Market St.  
Jacksonville, FL 32216

5 Oct 94

REF: EMERGENCY RESPONSE DATA

Dear Gentlemen:

Attached are the current site maps, hazardous waste stream characterization, and inspection log forms that will assist in the event of an emergency release at North Florida Shipyard / Commodores Point.


Any suggestions or recommendations concerning our preparedness for any contingency would be appreciated.

Cordially,

John B. Shiffert

jbs:wlb

Z 180 772 823  
E8E 277 081 Z

  
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P.O., State and ZIP Code JACKSONVILLE, FL 32216	
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Return Receipt Showing to Whom, Date, and Address	1.00
TOTAL Postage & Fees	\$ 2.52
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PS Form 3800, March 1993

JACKSONVILLE FL 32216  
OCT 5 1994



# NORTH FLORIDA SHIPYARD, INC.

COMMODORES POINT — ADMINISTRATIVE OFFICE  
P. O. BOX 3255  
JACKSONVILLE, FLORIDA 32206

City of Jacksonville  
Fire and Rescue Department  
Emergency Preparedness  
107 N. Market St.  
Jacksonville, Fl 32216

5 Oct 94

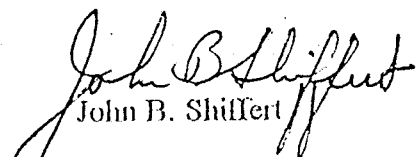
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Cordially,

  
John B. Shiffert  
jbs:wlb

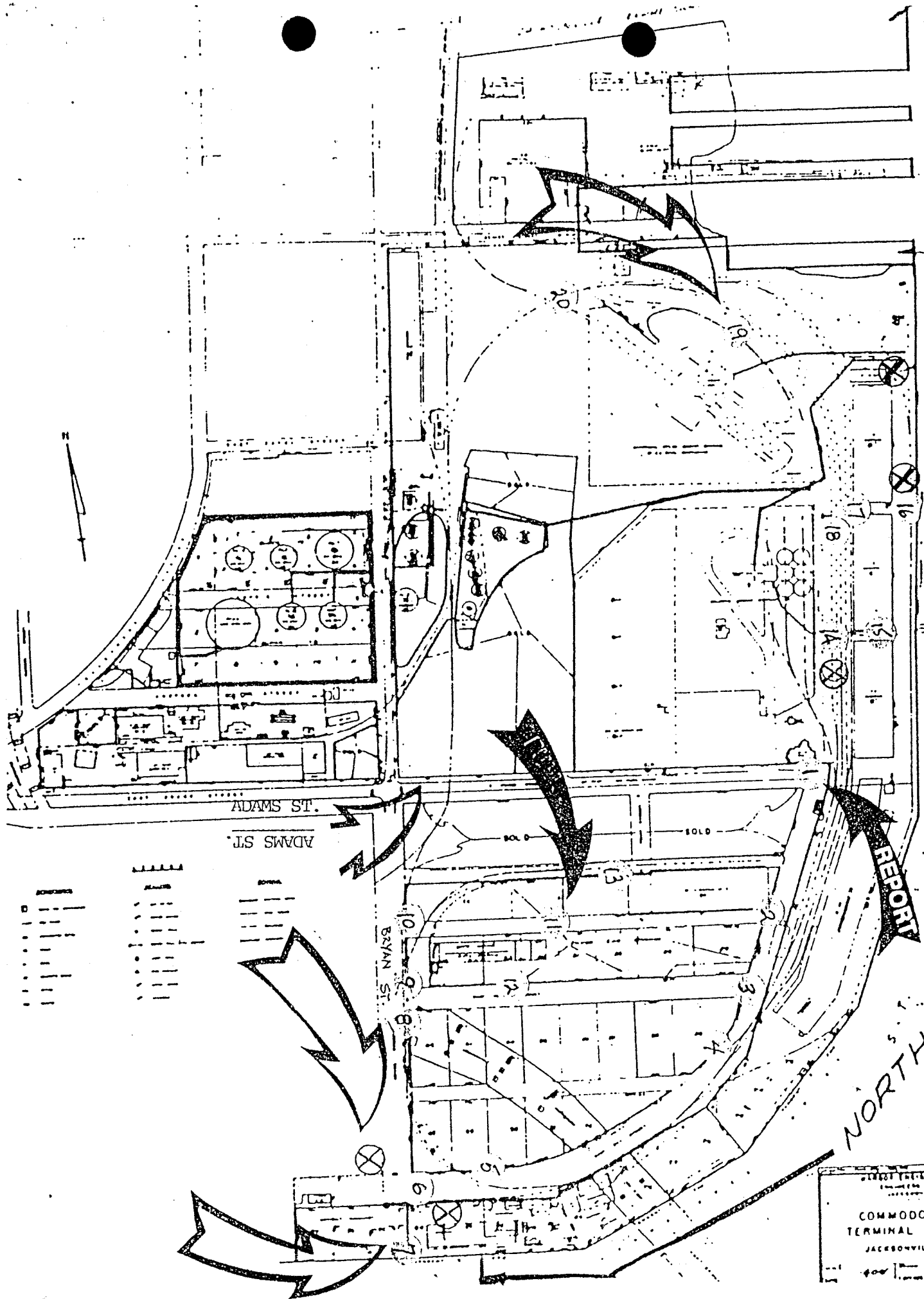
NORTH FLORIDA SHIPYARD  
HAZARDOUS WASTE CHARACTERIZATION

DATE: OCT 7, 1994.

COMMODORES POINT:

1. PRINCIPLE HAZARDOUS WASTE STREAM; PAINT RELATED WASTE FROM SHIP REPAIR. PAINT WASTE IS CLASSIFIED AS HAZARDOUS DUE TO IGNITABILITY AND TOXIC PROPERTIES. NFSY HAS A HAZARDOUS WASTE STORAGE AREA INSIDE WAREHOUSE "D". NFSY IS A SMALL QUANTITY GENERATOR. HAZARDOUS WASTE STORAGE IS INSPECTED AND LOGGED WEEKLY.





PROPOSED NEW CALISTRICTION

REPORT

NORTH FLOOR

COMMODORE PARK  
 TERMINAL CORPORATION  
 JACKSONVILLE, FLORIDA



# NORTH FLORIDA SHIPYARD, INC.

COMMODORES POINT — ADMINISTRATIVE OFFICE  
P. O. BOX 3255  
JACKSONVILLE, FLORIDA 32206



EMERGENCY GATES: 1, 7, 19

EMERGENCY GATES KEYS: Blue Circle, Lehigh, Apex, Mr. Hertle, & NFSY Security

FIRE MAINS (Indicator)

Fire Main at Gate 6,7 is freshwater and riverwater.

GATES BY NUMBER: )

WAREHOUSE D IS LOCATED ON THE RIVER IMMEDIATELY NORTH OF GATE 16/17.

POLLUTION STORAGE IS LOCATED NEXT TO THE TRANSPORTATION WAREHOUSE NEXT TO GATE #2.

FUEL STATION IS LOCATED BETWEEN GATE 13 and 11.

Northeast Florida Emergency Planning Committee  
9143 Phillips Highway, Ste. 350  
Jacksonville, Florida 32256

5 Oct 94

REF: EMERGENCY RESPONSE DATA

Dear Gentlemen:

Attached are the current site maps, hazardous waste stream characterization, and inspection log forms that will assist in the event of an emergency release at North Florida Shipyard / Commodores Point.

Any suggestions or recommendations concerning our preparedness for any contingency would be appreciated.

Cordially,

John B. Shiffert

jbs:wlb



Z 120 772 324

Receipt for  
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Do not use for International Mail  
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PS Form 3800, March 1993

Sent to NORTHEAST FLORIDA EMER. PLANNING COMMITTEE	
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P.O., State and ZIP Code JACKSONVILLE, FL 32256	
Postage	\$ 52
Certified Fee	1.00
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Return Receipt Showing to Whom, Date, and Addressee's Address	1.00
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# NORTH FLORIDA SHIPYARD, INC.

COMMODORES POINT — ADMINISTRATIVE OFFICE  
P. O. BOX 3255  
JACKSONVILLE, FLORIDA 32206

Northeast Florida Emergency Planning Committee  
9143 Phillips Highway, Ste. 350  
Jacksonville, Florida 32256

5 Oct 94

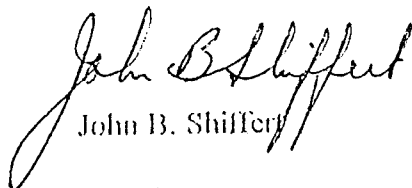
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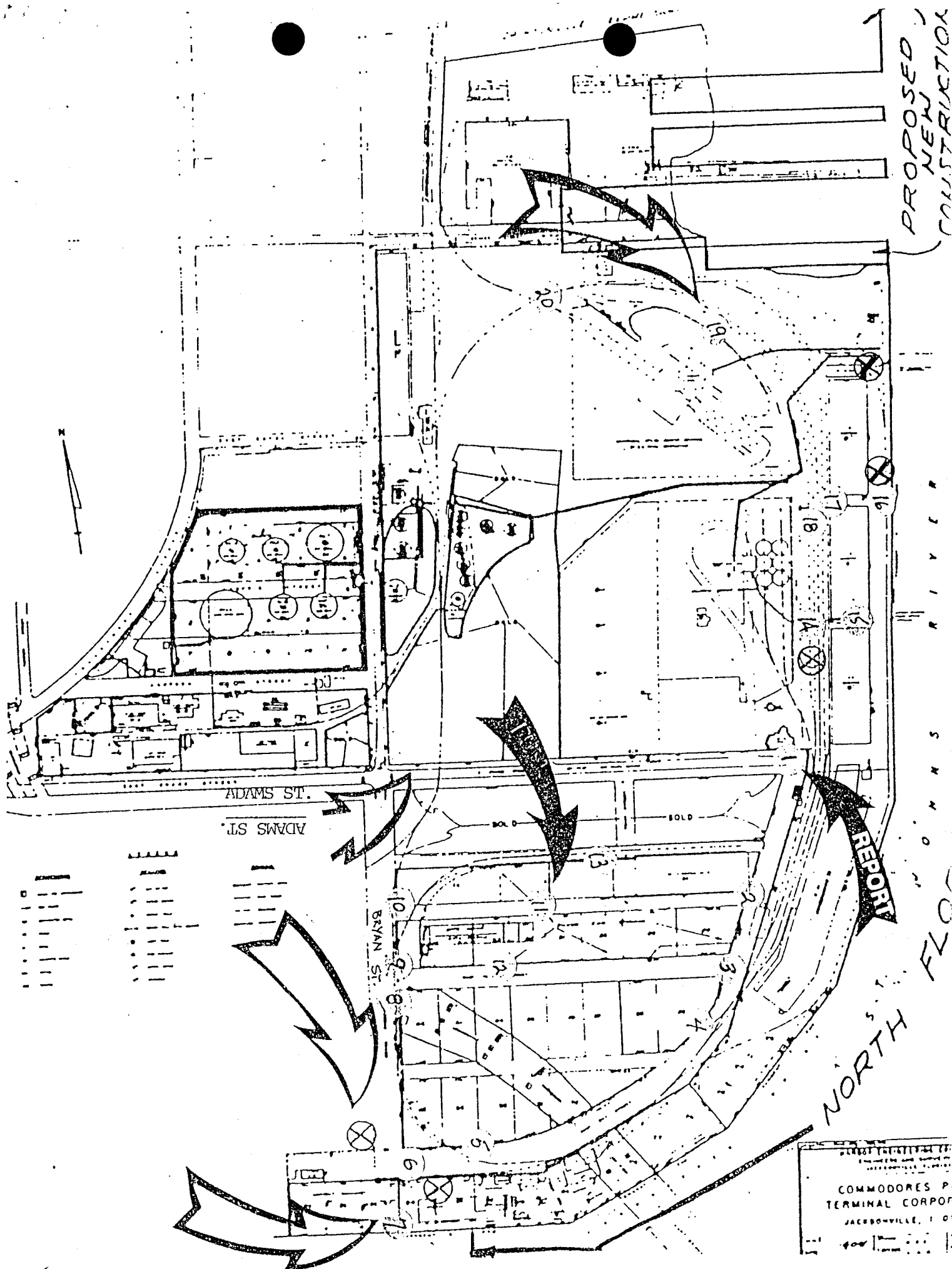
jbs:wlb

NORTH FLORIDA SHIPYARD  
HAZARDOUS WASTE CHARACTERIZATION

DATE: OCT 7, 1994.

COMMODORES POINT:

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PROPOSED  
NEW  
CONSTRUCTION

NORTH FLORIDA RIVER

NORTH FLORIDA RIVER

COMMODORE P.  
TERMINAL CORPOR  
JACKSONVILLE, FLOR.

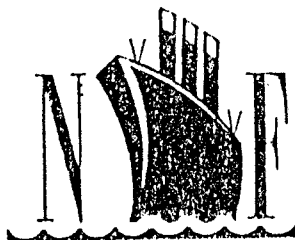
ADAMS ST.

ADAMS ST.

BRYAN ST.

REPORT

SOLD



# NORTH FLORIDA SHIPYARD, INC.

COMMODORES POINT — ADMINISTRATIVE OFFICE  
P. O. BOX 3255  
JACKSONVILLE, FLORIDA 32206



EMERGENCY GATES: 1, 7, 19

EMERGENCY GATES KEYS: Blue Circle, Lehigh, Apex, Mr. Hertle, & NFSY Security

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State Emergency Response Commission  
2740 Centerview Drive  
Tallahassee, FL 32399-2149

5 Oct 94

REF: EMERGENCY RESPONSE DATA

Dear Gentlemen:

Attached are the current site maps, hazardous waste stream characterization, and inspection log forms that will assist in the event of an emergency release at North Florida Shipyard / Commodores Point.


Any suggestions or recommendations concerning our preparedness for any contingency would be appreciated.

Cordially,

John B. Shiffert

jbs:wlb

Z 140 772 322

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Do not use for International Mail  
(See Reverse)

PS Form 3800, March 1993

Sent to <b>STATE EMERGENCY RESPONSE COMMISSION</b>	
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P. O., State and ZIP Code <b>TALLAHASSEE, FL 32399</b>	
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Special Delivery Fee	1.00
Restricted Delivery Fee	
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Return Receipt Showing to Whom, Date, and Address of Recipient	
TOTAL POSTAGE & Fees	1.00
Postmark Date	\$ 2.52

OCT 17 1994  
USPO





# NORTH FLORIDA SHIPYARD, INC.

• COMMODORES POINT — ADMINISTRATIVE OFFICE  
P. O. BOX 3255  
JACKSONVILLE, FLORIDA 32206

State Emergency Response Commission  
2740 Centerview Drive  
Tallahassee, FL 32399-2149

5 Oct 94

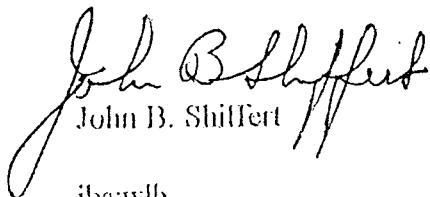
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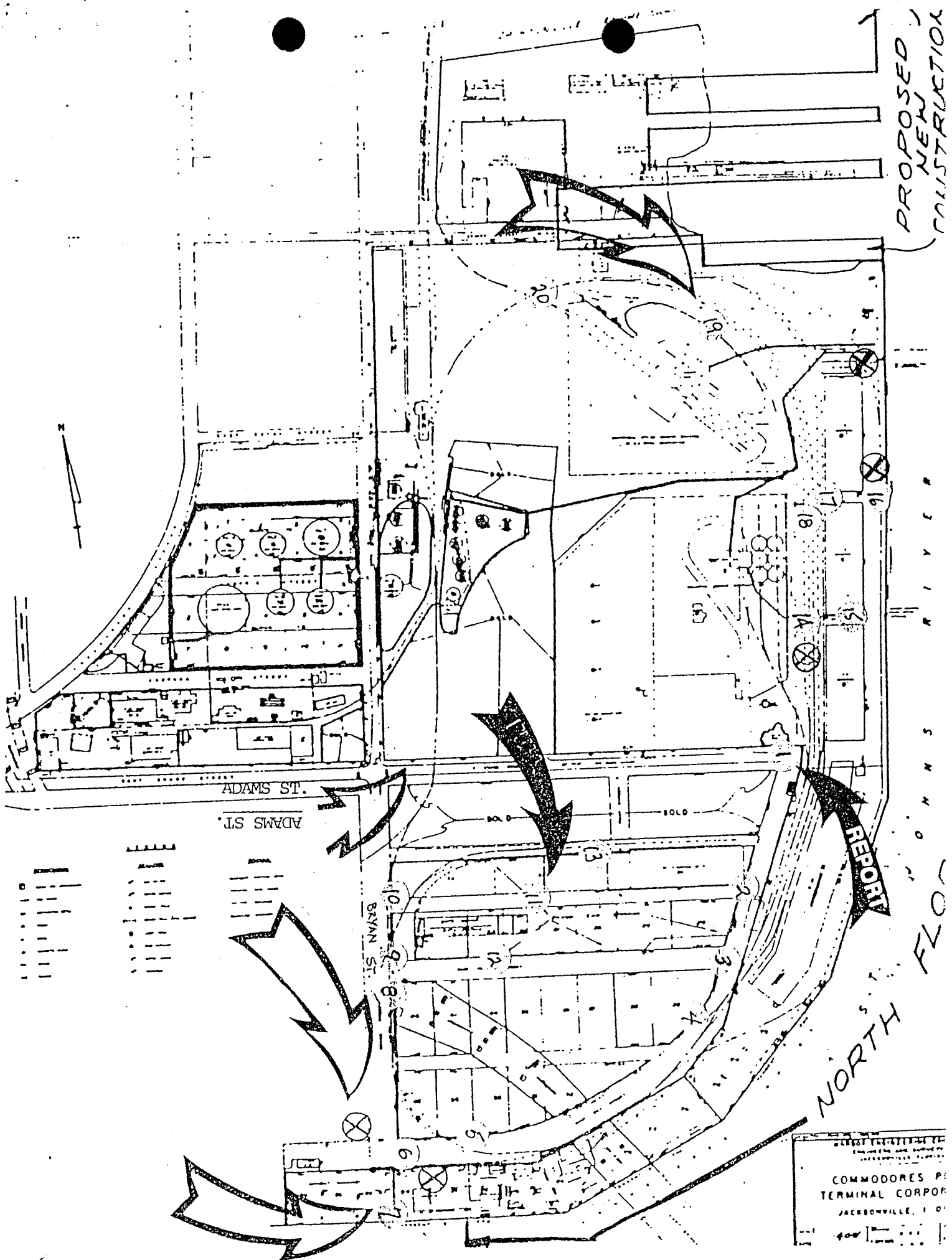
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NORTH FLORIDA SHIPYARD  
HAZARDOUS WASTE CHARACTERIZATION

DATE: OCT 7, 1994.

COMMODORES POINT:

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PROPOSED  
NEW  
CONSTRUCTION

ADAMS ST.

ADAMS ST.

BRYAN ST.

REPORT

NORTH FLOOR

COMMODORES PARK  
TERMINAL CORPORATION  
JACKSONVILLE, FLORIDA



# NORTH FLORIDA SHIPYARD, INC.

COMMODORES POINT — ADMINISTRATIVE OFFICE  
P. O. BOX 3255  
JACKSONVILLE, FLORIDA 32206



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CITY OF JACKSONVILLE  
CHIEF OF POLICE  
501 E. Bay St.  
Jacksonville, Florida 32202

5 Oct 94

REF: EMERGENCY RESPONSE DATA

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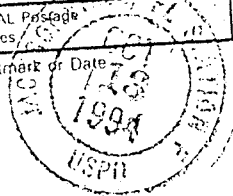
John B. Shiffert

jbs:wlb

Z 180 772 321

  
UNITED STATES  
POSTAL SERVICE

**Receipt for  
Certified Mail**  
No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

Sent to	Chief of Police City of Jacksonville
Street and No.	501 E. Bay Street
P.O., State and ZIP Code	Jacksonville, FL 32202
Postage	\$ 52
Certified Fee	1.00
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	1.00
TOTAL Postage & Fees	\$ 2.52
Postmark or Date	

PS Form 3800, March 1993



# NORTH FLORIDA SHIPYARD, INC.

COMMODORES POINT — ADMINISTRATIVE OFFICE  
P. O. BOX 3255  
JACKSONVILLE, FLORIDA 32206

CITY OF JACKSONVILLE  
CHIEF OF POLICE  
501 E. Bay St.  
Jacksonville, Florida 32202

5 Oct 94

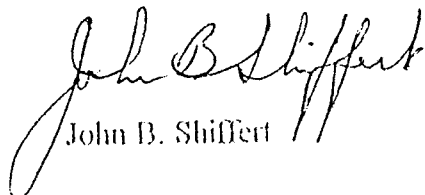
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Cordially,

  
John B. Shiffert

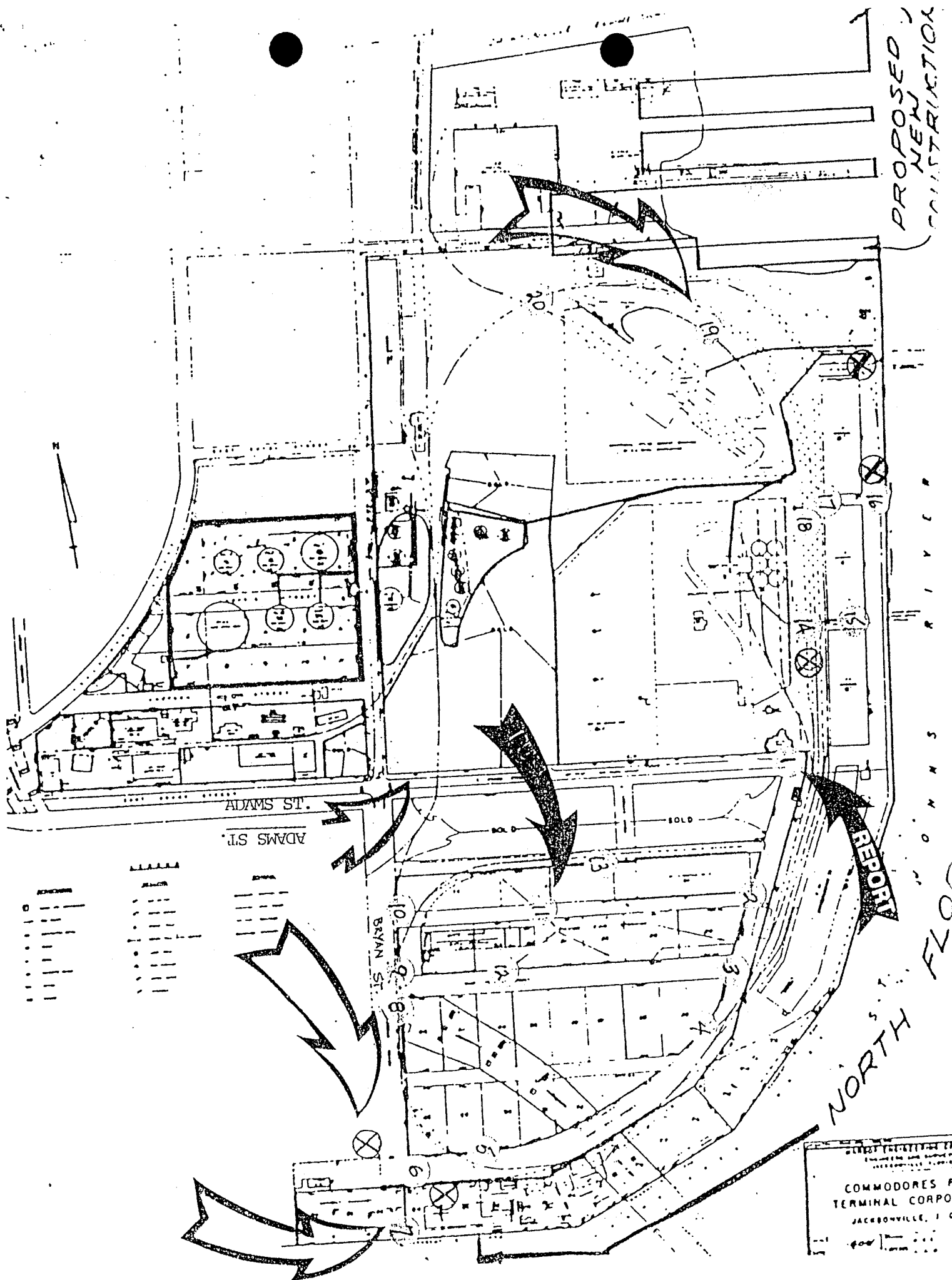
jbs:wlb

NORTH FLORIDA SHIPYARD  
HAZARDOUS WASTE CHARACTERIZATION

DATE: OCT 7, 1994.

COMMODORES POINT:

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PROPOSED  
NEW  
RESTRICTION

ADAMS ST.  
ADAMS ST.

BRYAN ST.

REPORT  
OHIO RIVER  
NORTH FLOOR

COMMODORE P  
TERMINAL CORPO  
JACKSONVILLE, I O





# NORTH FLORIDA SHIPYARD, INC.

INCORPORATED IN THE STATE OF FLORIDA

REGISTERED OFFICE: 1000 W. UNIVERSITY BLVD., SUITE 100, GAITHERSBURG, MD 20878

TELEPHONE: (301) 251-1000

FACSIMILE: (301) 251-1000

SHIPYARD ADDRESS: 1000 W. UNIVERSITY BLVD., SUITE 100, GAITHERSBURG, MD 20878

### TERMS BY NUMBER:

1. PAYMENT IS TO BE MADE ON THE BASIS OF INVOICE AND NOT BY ORDER OF THE SHIPYARD.

2. ALL DELIVERIES TO BE MADE TO THE SHIPYARD WAREHOUSE NEXT TO GATE #2.

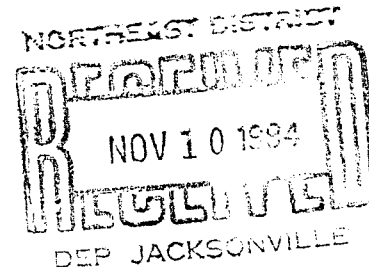
3. ALL DELIVERIES TO BE MADE BY 12:00 P.M. ON THE DAY OF DELIVERY.



Missimer Division  
ViroGroup, Inc.  
8130 Baymeadows Way West  
Suite 104  
Jacksonville, FL 32256  
Phone 904-448-6400  
FAX 904-448-8556

October 24, 1994

Mr. Ashwin Patel  
Florida Department of Environmental Protection  
Northeast District  
7825 Baymeadows Way  
Suite 200B  
Jacksonville, Florida 32256-7577



**Subject: Extension Request, Preliminary Contamination Assessment,  
North Florida Shipyards, Commodores Point Facility  
ViroGroup Project No. 04-01943.05**

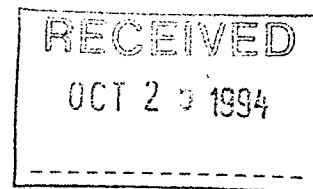
Dear Mr Patel:

On behalf of North Florida Shipyards, Inc., ViroGroup, Inc. requests a 7-day extension for submittal of the preliminary contamination assessment plan (PCAP) for the Commodores Point facility. As discussed in our meeting today, we put preparation of the PCAP on temporary hold thinking that you wanted to see the facility before the PCAP was submitted. The new submittal deadline would be Friday, November 4, 1994. If you have any questions, or require additional information, please feel free to call.

Sincerely,

VIROGROUP, INC., MISSIMER DIVISION

James P. Oliveros, P.G.  
Senior Hydrogeologist



cc: John Shiffert - North Florida Shipyards, Inc.  
Richard L. Maguire - Rogers, Towers  
Barry Robertson - ViroGroup, Inc.

**ENCLOSURE 6**



# Department of Environmental Protection

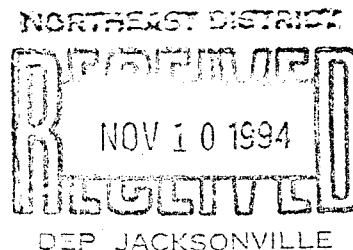
Lawton Chiles  
Governor

Northeast District  
7825 Baymeadows Way, Suite B200  
Jacksonville, Florida 32256-7590

Virginia B. Wetherell  
Secretary

October 25, 1994

Mr. John Shiffert  
North Florida Shipyards, Inc.  
P.O. Box 3255  
Jacksonville, FL 32206



Dear Mr. Shiffert:

North Florida Shipyards, Inc. - Commodores Point  
FLD 982 121 329  
OGC #91-20752  
Duval County - Hazardous Waste

Your request for a seven (7) day extension for the submittal of the Preliminary Contamination Assessment Plan (PCAP) for the above referenced facility is granted. Please note that the PCAP must be submitted to the Department no later than November 4, 1994.

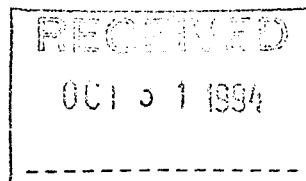
If you have any questions, please contact me at the letterhead address or call (904)448-4320, extension 381.

Sincerely,

*Stanley Tam*  
Stanley Tam  
Hazardous Waste Engineer

*ST*  
ST:st

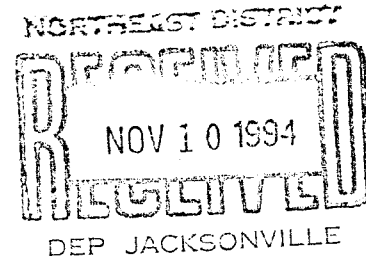
cc: Jim Oliveros  
Rich Maguire ✓



ENCLOSURE 7

October 20, 1994

Mr. Stanley Tam  
Florida Department of Environmental Protection  
Northeast District  
7825 Baymeadows Way  
Suite 200B  
Jacksonville, Florida 32256-7577



**Subject: Verification of Quality Assurance Plan Approvals, North  
Florida Shipyards, Commodores Point Facility  
ViroGroup Project No. 04-01943.05**

Dear Mr Tam:

On behalf of North Florida Shipyards, Inc., ViroGroup, Inc. is pleased to provide verification of approval of its own Comprehensive Quality Assurance (QA) Plan (attached). In addition, attached is verification of approval of the QA plan for our proposed laboratory; Savannah Laboratories and Environmental Services, Inc. (Savannah). The attached information should be sufficient to meet the requirements of the Deferred Prosecution Agreement, Exhibit 5 - Preliminary Contamination Assessment Actions. If you have any questions, or require additional information, please feel free to call.

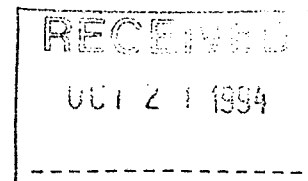
Sincerely,

VIROGROUP, INC., MISSIMER DIVISION



James P. Oliveros, P.G.  
Senior Hydrogeologist

cc: Richard L. Maguire - Rogers, Towers  
John Shiffert - North Florida Shipyards



**ENCLOSURE 12**



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

May 11, 1994

Susan Blacketer  
ViroGroup, Inc./Missimer Division  
428 Pine Island Road, SW  
Cape Coral FL 33991

**SUBJECT: Quality Assurance Review; ViroGroup, Inc./Missimer  
Division Comprehensive QA Plan #870468  
Amendment to an approved document**

Dear Susan:

The referenced document pages, received on January 26, 1994, have been reviewed and approved. All comments on the annotated pages and review checklist items, must be incorporated into your procedures immediately as a condition of this approval. Further detail on the status of this plan is explained in the enclosed guidance document (DER QAS #90-03).

This approval is applicable to the following sampling capabilities:

- \* Surface Water
- \* Wastewater
- \* Groundwater
- \* Air Stripper & Remedial Treatment Systems
- \* Wells with in-place plumbing
- \* Soil
- \* Domestic waste sludges
- \* Sludges- Solid and hazardous wastes
- \* Liquid hazardous waste
- \* Drinking water supply systems
- \* Temporary well points
- \* Potable well
- \* Sediment

The attached review checklist is being used for the actual review of your QA Plan, although additional review comments may be included in future reviews in order to clarify items in the checklist.

Checklist comments that have an "N" designated in the blank space indicates incorrect, incomplete, or missing information. These checklist items require discussion and/or clarification when revising your plan. Checklist comments that have an "Y" or "√" designated in the blank space indicates that the information included in the plan is present and correct, and no further revision is required.

Checklist comments designated as not applicable "NA" indicates information that is not required because the capability is not apparent in the CompQAP. If your company wants approval for capabilities listed as "NA", sufficient information must be included (and approved) in your plan. Question marks (?) indicate information that may or may not be applicable (unable to determine in the review) and must be clarified in revisions to your plan.

Letter to Susan Blacketer  
May 11, 1994  
Page Two of Two

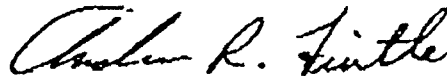
Checklist items specified as rejectable ("R") in the first column on the left hand side of the checklist indicate the comments that must be addressed before approval or approval pending status may be considered. If any of the checklist items are marked "N" for a rejectable item ("R"), the QA plan will be returned unapproved.

Checklist items specified as approved-pending information ("AP") indicate comments that also must be addressed. Although the omission of several of these types of items will allow an approved-pending status of the plan, a significant number of incorrect or missing items will require the plan to be returned unapproved.

Your next set of required annual amendments must include revisions that incorporate and/or address all comments on the annotated pages and the review checklist items. Amendments must be received by the QA Section on or before January 26, 1995, 30 days before approval date.

If you have any questions concerning this matter, please call Debbie Koren at (904) 488-2796.

Sincerely,



Sylvia S. Labie, QA Officer  
Quality Assurance Section

SSL/DSK/dsk

Attachments (3): DER QAS #90-03 (Explanation of Status)  
Copy of Annotated CompQAP Pages  
Copy of Annotated Review Checklist Field Only

cc: CompQAP #870468

# SL SAVANNAH LABORATORIES & ENVIRONMENTAL SERVICES, INC.

2845 Industrial Plaza Drive (32301) • P.O. Box 13056 • Tallahassee, FL 32317-3056 • (904) 878-3994 • Fax (904) 878-9504

FAX TRANSMITTAL MEMO

TO: Name Mr. Ralph Mayillo  
Company Vista Group, Inc.  
Location \_\_\_\_\_  
FAX# 22

FROM: Name: LAURA SNEAD  
Location TALLAHASSEE  
Date 10/17/94  
Total Pages 2

MESSAGE St. Comp OAPP # 890142.G Approval

page  
Ralph - This is the last dated signed  
approval page. We have submitted revisions to  
the OAPP dated 5/94 + 9/94 which we are

*Presently operating under.  
Please let me know if you need  
a copy. Sincerely, Laura*

# COMPREHENSIVE QUALITY ASSURANCE PLAN

Prepared by and for:

SAVANNAH LABORATORIES AND ENVIRONMENTAL SERVICES, INC.

## APPROVED

### SAVANNAH DIVISION

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Janette D. Long  
Consultant Manager

9-16-92  
Date

Alan C. Bailey  
Alan C. Bailey  
Consultant QA Officer

9-16-92  
Date

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Janet B. Pruitt  
Consultant Manager

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Date

Elizabeth L. Schneider  
Elizabeth L. Schneider  
Consultant QA Officer

9/24/92  
Date

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Kathy Sheffield  
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9-23-92  
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Inas M. Sobky  
Inas M. Sobky  
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Jesse L. Smith  
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9-21-92  
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Michele H. Lersch  
Consultant QA Officer

9-21-92  
Date

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Paul Canevaro  
Paul Canevaro  
Consultant Manager

9-17-92  
Date

Kathy C. Haringer  
Kathy C. Haringer  
Consultant QA Officer

9-17-92  
Date

Sylvia S. Lable  
Sylvia S. Lable  
FDER QA Officer

4-6-93  
Date



Section 2  
Revision 1  
Date: 9/94  
Page 1 of 4

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Revision 1  
Date: 9/94  
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Date: 9/94  
Page 4 of 4

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**PRELIMINARY CONTAMINATION ASSESSMENT PLAN  
NORTH FLORIDA SHIPYARDS, INC.  
COMMODORES POINT FACILITY  
225 TALLEYRAND AVENUE  
JACKSONVILLE, FLORIDA**

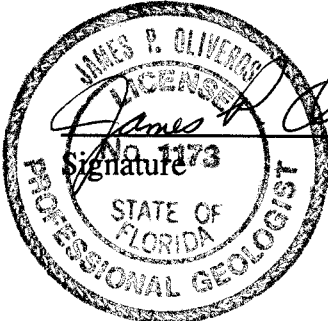
Mr. Stanley C. Tam  
Florida Department of Environmental Regulation  
Northeast District

ViroGroup Project No. 04-01943.05  
Control No. 4427

Barry D. Robertson, P.G.  
Senior Geologist

*Robert D. Robertson*  
\_\_\_\_\_  
Signature Date

James P. Oliveros, P.G.  
Florida Licensed Professional  
Geologist No. 1173

*James P. Oliveros*  
\_\_\_\_\_  
Signature Date  


Prepared  
November 4, 1994  
by

ViroGroup, Inc., Florida Division, 8130 Baymeadows Way West, Suite 104, Jacksonville, Florida, 32256  
(904) 448-6400

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## 1.0 INTRODUCTION

North Florida Shipyards, Inc., (NFS) retained ViroGroup, Inc./Florida Division (ViroGroup) to prepare a Preliminary Contamination Assessment Plan (PCAP) for the Commodores Point Facility located at 2000 East Bay Street in Jacksonville, Duval County, Florida. The site is located in Section 45, Township 2S, Range 27E (see Site Location Map Figure 1-1). The Florida Department of Environmental Protection (FDEP) conducted a hazardous waste compliance inspection of the NFS Commodores Point Facility on March 11, 1992. Some of the alleged hazardous waste compliance violations identified during the inspection were outlined by the FDEP in a Deferred Prosecution Agreement, dated September 28, 1994 (State Investigation Number 91-20752). As part of the requirements of the Deferred Prosecution Agreement, NFS must submit to the FDEP a PCAP in accordance with the FDEP document entitled "Preliminary Contamination Assessment Actions".

NFS is a ship repair and conversion facility. Activities at the facility include welding, mechanical refitting, grit blasting, metal shot blasting, and painting. Approximately 30 tons of spent grit is collected each month. NFS has been in operation at this facility since the mid 1970's.

The purpose of the PCAP is to present a work plan to the FDEP to evaluate whether soil or groundwater has been adversely affected by the stockpiling of spent blast grit material. If contamination is detected, the Preliminary Contamination Assessment Report (PCAR) will assess whether contaminant levels exceed the criteria as set forth in the Florida Administrative Code (FAC) Chapter 17-3.

### 1.1 Scope of Work

This PCAP describes the sources of information and field investigations that will be used to accomplish the following tasks:

1. Characterize the regional hydrogeology;

2. Characterize the surficial hydrogeology of the site;
3. Identify and classify the surficial aquifer at the site;
4. Identify private and public potable water wells within one-half mile of the site;
5. Identify permanent surface water bodies within one-half mile of the site;
6. Construct and develop monitoring wells on the site;
7. Survey monitoring wells to an arbitrary datum so that groundwater flow direction may be determined;
8. Collect and analyze groundwater samples; and
9. Collect and analyze soil samples

In addition, this PCAP;

1. Describes the location and justification of monitoring wells to be constructed on the site;
2. Describes sampling and equipment methods that will be used to collect soil and groundwater samples at the site;
3. Identifies the parameters and analytical methods that will be used for soil and groundwater sample analysis;
4. Identifies a laboratory to which soil and groundwater samples will be submitted for analysis;
5. Provides maps and figures as appropriate to show the location of NFS Commodores Point, major physical features on the site, proposed locations of monitoring wells and soil borings, and typical monitoring well construction details.



## **2.0 SITE DESCRIPTION AND HISTORY**

### **2.1 General Description**

The NFS facility is located in downtown Jacksonville, Florida at Commodores Point. The property is bordered on the north by commercial property and the St. Johns River, on the south by the St. Johns River, on the east by the St. Johns River, and on the west by Lehigh Portland Cement Company and Blue Circle Atlantic Company. The facility contains four warehouse areas, a railyard, office building, and an asphalt-paved employee parking area. The waterfront consists of a series of bulkheads capable of accommodating large vessels. A site plan of the facility is shown in Figure 2.1.

### **2.2 Description and History of the Areas of Investigation**

The area being investigated by this PCAP includes the blast grit and paint disposal area. A historical outline of key events and dates associated with this investigation is included below:

- March 11, 1992 - FDEP conducted hazardous waste compliance inspection at NFS Commodores Point Facility;
- August 3, 1992 - FDEP issued Warning Notice HW-W-16-0018, to NFS for various violations of Title 40 of the Code of Federal Regulations (CFR);
- May 18, 1992 - Collection and analyses of 2 blast grit samples by GWL/EMCON SE;
- March 1993 - Collection and analyses of 7 blast grit samples by EMCON SE;
- June 1993 - Excavation and disposal of approximately 40 cubic yards of spent Black Beauty blast grit with oversight by ViroGroup, Inc.; and,

- September 28, 1994 - North Florida Shipyards enters into a Deferred Prosecution Agreement with FDEP requiring a preliminary contamination assessment of the area.

### **2.3 Facility Process Description**

NFS Commodores Point facility conducts ship repair and conversion, which includes a limited amount of grit blasting and painting. The facility is equipped with a 6,500-ton dry dock that can service ships up to 500 feet in length. Structural work, grit blasting and painting are done at the facility, with repair of motors, pumps and engines being done offsite.

Two methods of paint removal by grit blasting are utilized by NFS. Major structural blasting is done with Black Beauty in the outdoor dry dock. Small components that can be brought inside are blasted with a re-usable metal shot.

## **3.0 GEOLOGY AND HYDROGEOLOGY**

### **3.1 Regional Geology and Hydrogeology**

The regional geology and hydrogeology will be investigated by a review of published interpretive reports describing the geology and hydrogeology of northeast Florida. Sources of published reports that will be reviewed include the Florida Geological Survey and the U.S. Geological Survey. Elevations of wells identified during the well inventory will be used to supplement the information obtained from published reports.

### **3.2 Site Geology and Hydrogeology**

Data from the monitoring well constructed in the surficial aquifer during implementation of the PCAP will be used to characterize the shallow subsurface geology and hydrogeology of the site. Supplemental information from wells installed nearby as part of other investigations will also be reviewed. A detailed descriptive geologic log will be prepared by a ViroGroup geologist who will be onsite during installation of the monitoring well.

### **3.3 Groundwater Flow Direction**

Groundwater flow direction for the area will be determined based on the surveyed groundwater levels and information gathered from past investigations. Permanent water level measuring points (MPs) will be established on the casing of each monitoring well. MP elevations will be referenced to an arbitrary onsite benchmark surveyed by ViroGroup personnel.

### **3.4 Aquifer Identification and Classification**

The site overlies unconsolidated medium to fine sands and clayey sands that range in age from Miocene to recent. The depth to the principal aquifer and the presence of overlying permeable or confining units at and near the site will be investigated by an examination of

any available logs of wells identified during the well inventory. Classification of shallow groundwater, in accordance with Chapter 17-3 FAC, will be determined at the site based on available existing information.

### **3.5 Potable Water Supply Well Inventory**

A well inventory will be conducted to determine the number and locations of public potable water-supply wells within a one-half mile radius of the facility. A search of computer files of the St. Johns River Water Management District and the City of Jacksonville Regulatory and Environmental Services Department will be made. Wells identified by the file search will be verified as potable water-supply wells by field reconnaissance.

### **3.6 Surface Water Inventory and Classification**

Permanent surface-water bodies within one-half mile of the site will be identified by an examination of the U.S. Geological Survey 7-1/2 minute quadrangle map of Jacksonville, Florida. Surface-water bodies identified on the topographic map will be verified by field reconnaissance.

## **4.0 FIELD INVESTIGATION**

### **4.1 Monitoring Well Location and Identification**

During a routine FDEP hazardous waste compliance inspection, the NFS facility was cited for alleged improper storage of a potential hazardous waste. The potential waste, dried paint from "RCRA empty" containers, was observed by FDEP personnel on soil near the spent blast grit (paint area) (see Figures 2-1 and 4-1). The dried paint was inadvertently squeezed from the containers when the containers were being crushed. The local landfill had requested that the containers be crushed prior to deposition in receptacles.

ViroGroup proposes to install one monitoring well into the shallow aquifer to evaluate the potential impacts to the aquifer from the dried paint. One monitoring well will be installed in the paint area (see Figure 4-1, Monitoring Well/Soil Boring Location Map).

### **4.2 Monitoring Well Installation and Construction**

Two boreholes for shallow wells completed in the upper part of the surficial aquifer will be drilled by a truck-mounted drill rig using hollow-stem augers. Split spoon samples will be collected continuously down to a depth of 10 feet below ground surface (bgs). Physical characteristics of the split spoon samples will be observed to determine the lithologic classification of the soils. Boreholes will be terminated at an approximate depth of 10 feet bgs.

Monitoring wells will be constructed inside of the hollow-stem augers using clean two-inch diameter schedule 40 PVC casing fitted with 5 feet of 0.010-inch mill slotted screen. Screened intervals will be determined based on an estimation of the fluctuation of the groundwater table. Filter packs of 20-30 size silica sand will be installed in the annular space around the screened intervals from a total depth of approximately 10 feet bgs to approximately 2-5 feet bgs. A one foot bentonite seal will be placed above the sand packs

and the remaining annulus will be grouted to land surface. A typical monitoring well construction diagram is presented in Figure 4-2.

All monitoring wells to be installed as part of the PCAP will be developed using a centrifugal pump. Development will be considered complete when water withdrawn from the well does not contain visible sand or silt or when at least eight well volumes are evacuated from the well. The wells will be finished at grade level inside of a steel manhole access and set in a 3 feet x 3 feet concrete pad. Locking caps with locks will be used to secure the wells.

Equipment used to drill the boreholes and install monitoring wells will be decontaminated using a steam cleaner prior to use at each monitoring well location. Monitoring well installation, construction, and decontamination procedures will be performed in accordance with ViroGroup's approved Comprehensive Quality Assurance Plan (QAP) #870468-G on file with FDEP in Tallahassee, Florida.

#### **4.3 Soil Sample Location and Justification**

To comply with the PCAP requirements for evaluating soil quality in the potentially affected areas, one soil sample will be collected from the paint area. Since soil samples had previously been collected and analyzed from the blast grit area, none are proposed for this investigation. Those results will be evaluated and submitted in the preliminary contamination assessment report. The approximate soil sample location is shown in Figure 4-1. The soil sample will be collected from the vadose zone (1-2 feet bgs) during installation of the monitoring well. The sample will be submitted for laboratory analyses as described below.

In addition to the soil sample collected for laboratory analyses, soil samples will be collected for field lithologic evaluation from land surface to the total depth of the monitoring wells.

#### **4.3.1 Soil Sampling Procedures**

Soil samples for lithologic description will be collected with split spoon samplers. Samples will be collected continuously from the surface down to a depth of approximately 12-15 feet bgs. One soil sample from the paint area will be collected with a stainless steel hand auger and submitted for analytical testing. The stainless steel hand auger will be properly decontaminated (in accordance with ViroGroup's QAP) prior to collecting the analytical soil sample. An equipment rinsate sample will be collected and analyzed in accordance with ViroGroup's QAP. The soil sample will be placed in a properly identified laboratory supplied container. After collection, the sample will be preserved on ice and forwarded via overnight delivery to a FDEP-approved laboratory for analysis. Proper chain-of-custody procedures will be followed. All soil sampling and decontamination procedures will be performed in accordance with ViroGroup's QAP.

#### **4.4 Groundwater Sampling**

Groundwater samples will be collected from the newly installed monitoring well. Groundwater sampling protocol will be performed in accordance with ViroGroup's approved Comprehensive QAP. Prior to sampling, at least three well volumes of water will be evacuated from the well using a teflon bailer. After evacuation, samples will be collected from the well and placed in appropriate laboratory-supplied containers. After collection, samples will be preserved on ice and forwarded via overnight delivery to a FDEP-approved laboratory. Proper chain-of-custody procedures will be followed. Resumes of sampling personnel are presented in ViroGroup's QAP.

## 5.0 SAMPLE ANALYSES

### 5.1 Laboratory Selection and Criteria

The laboratory selected to perform the analytical work for the PCAP at the NFS facility is a reputable laboratory capable of performing the specified analysis in accordance with standards, methods, and practices exhibited in the FDEP's PCAP Action Rules. In addition, the laboratory has a FDEP-approved Generic Quality Assurance Project Plan (QAPP) that outlines sample handling and analytical procedures. Documents certifying that the laboratory identified below has a FDEP-approved QAPP were submitted to the FDEP in a correspondence dated October 20, 1994 (attached).

The laboratory being used for the project is indicated below:

Savannah Laboratories and Environmental Services, Inc.  
2846 Industrial Plaza Drive  
Tallahassee, Florida 32307  
Contact: Laura Snead

### 5.2 Soil Analyses

One soil sample will be collected at the NFS Commodore Point Facility for laboratory analysis. Analyses of the soil sample will be specific for the location. Because of solvents present in paint, the soil sample collected from the paint area will be analyzed for volatile organics using EPA Method 8260. Table 5-1 presents a summary of the soil and groundwater analytical methods.



### 5.3 Groundwater Analyses

Groundwater samples will be collected from the newly installed monitoring well. The groundwater samples from the paint area will be analyzed for total lead (filtered and unfiltered) using EPA Method 239.2 and for volatile organics using EPA Method 8260. Appropriate QA/QC samples will be submitted in accordance with ViroGroup's Comprehensive QAP.

TABLE 5-1. ANALYTICAL METHODS

SAMPLE DESIGNATION	MATRIX	EPA METHOD
MW-1 Paint Area	GROUNDWATER	239.2, 8260
SS-1 Paint Area	SOIL	8260
QA RINSATE*	DISTILLED WATER	239.2, 8260
QA DUPLICATE	GROUNDWATER	239.2, 8260

## 6.0 PROJECT WORK SCHEDULE

ViroGroup estimates that the time required to complete and submit the Preliminary Contamination Assessment Report will be approximately 15 weeks. A comprehensive project schedule is depicted in Figure 6-1. The schedule includes allowances for FDEP comments to draft documents and time for responses to comments. Field investigation is estimated to take no longer than two weeks. Six weeks have been reserved to receive analytical results from the laboratory.





<b>ViroGroup</b>	<i>AIR • WATER • SOIL TECHNOLOGY</i>		<b>MISSIMER DIVISION</b>	
	DRN. BY: MTA	DWG. NO. 91J1620		DATE: 11-03-94
	PROJECT NAME: 04-01943.05			NUMBER: 04-01943.05

FIGURE 1-1. SITE LOCATION MAP  
 SOURCE: USGS JACKSONVILLE, FL QUADRANGLE MAP



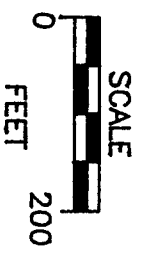
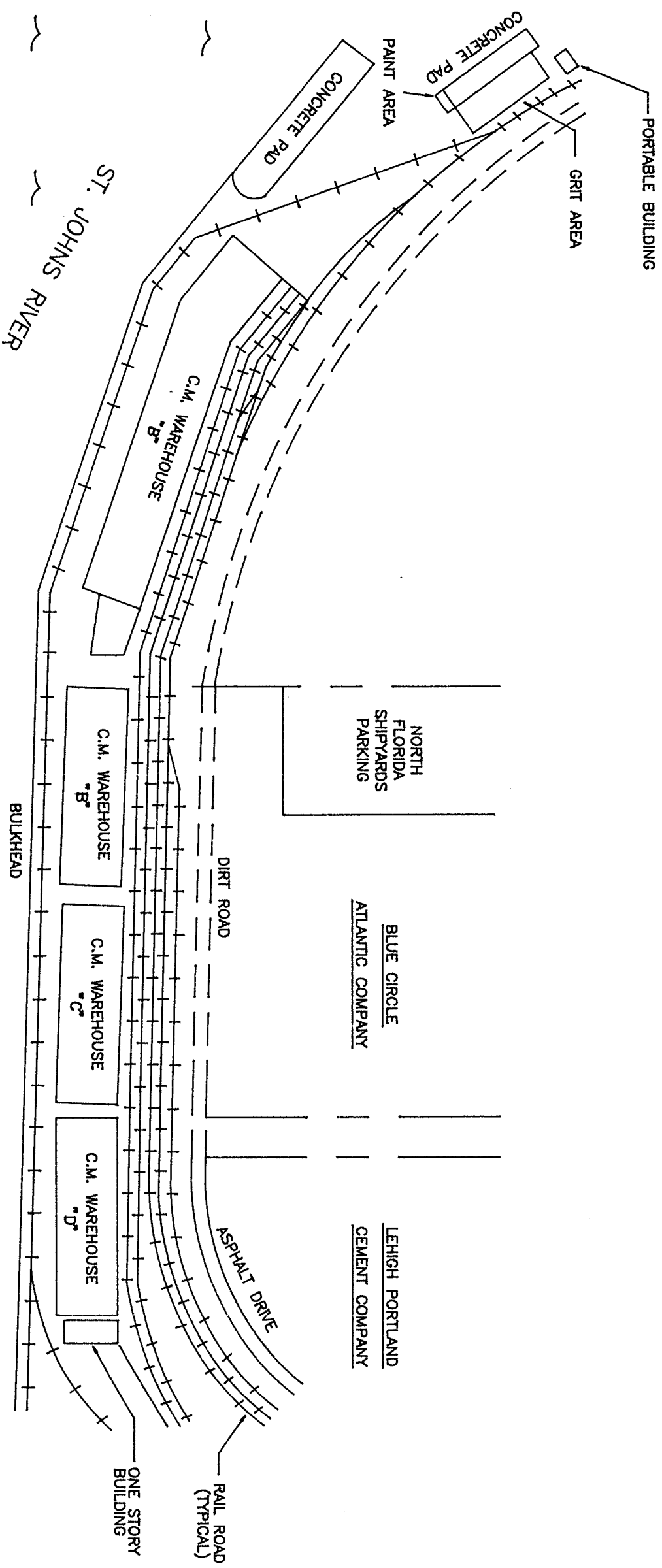
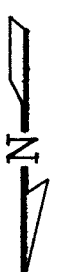


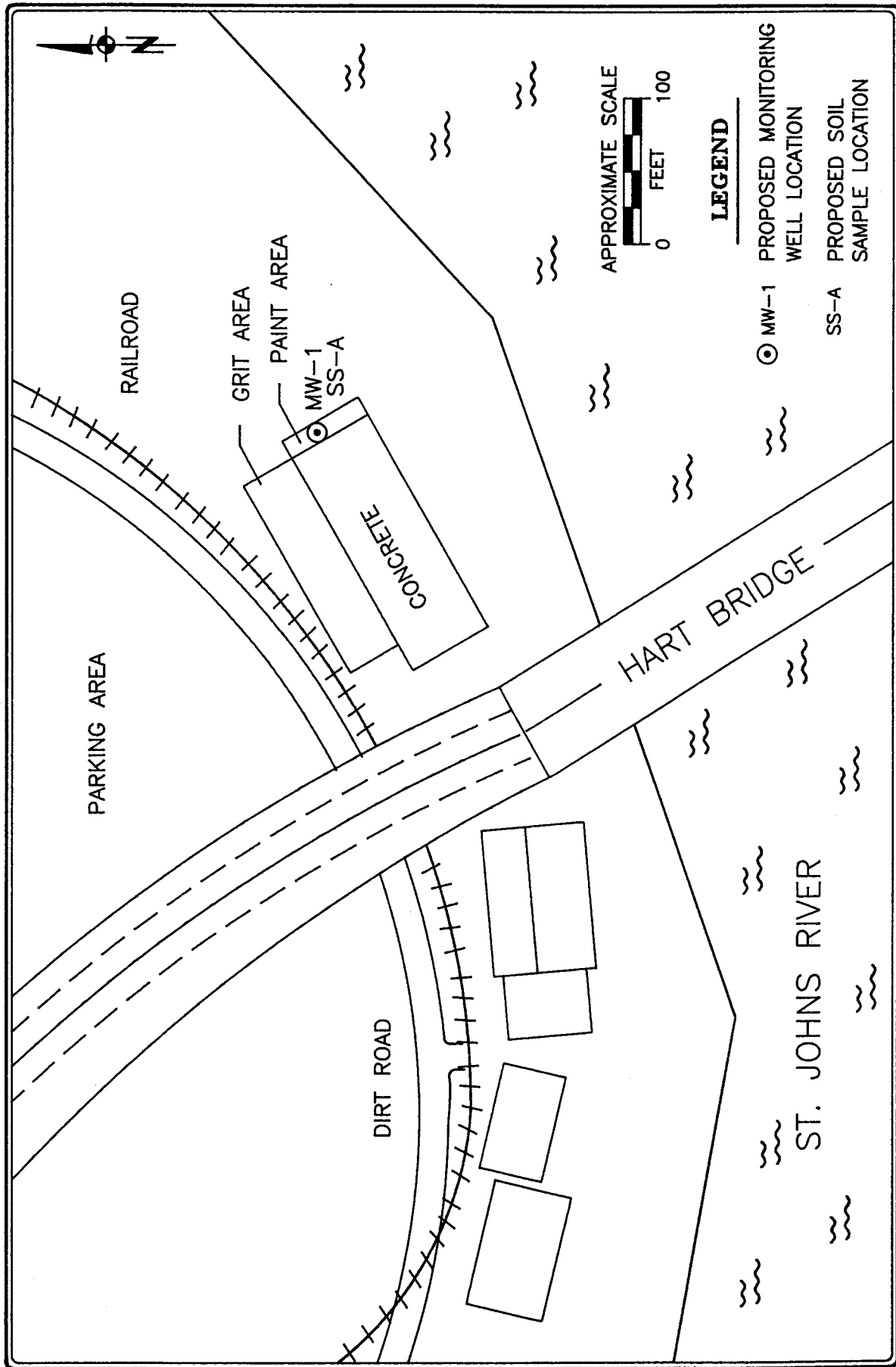
FIGURE 2-1. SITE PLAN

**ViroGroup**

*AIR • WATER • SOIL* **TECHNOLOGY**

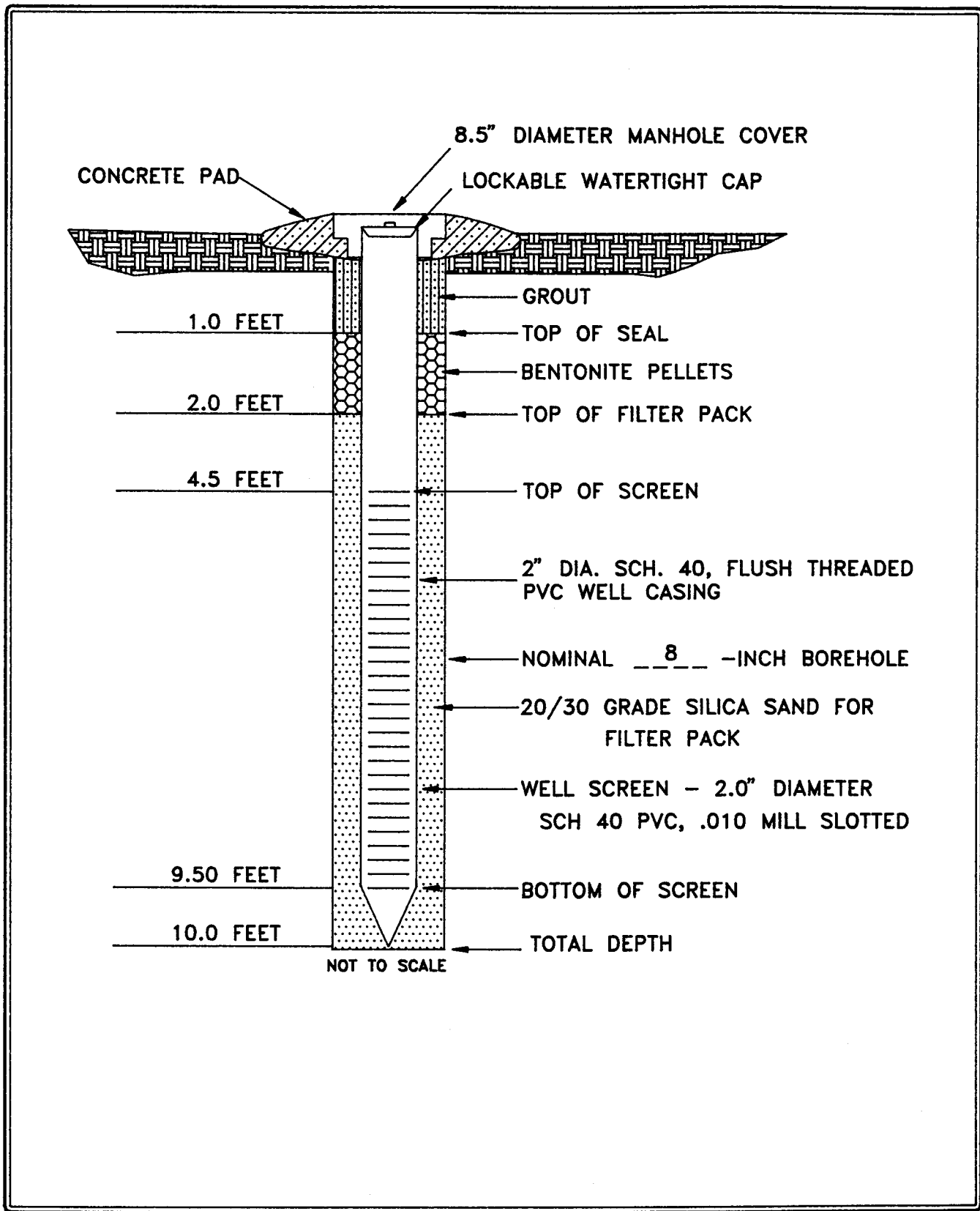
DRN. BY: NIL DWG. NUMBER: SITE PROJECT NUMBER: 04-01943.05 DATE: 11/1/94  
PROJECT NAME: NORTH FLORIDA SHIPYARDS, COMMODORES POINT TERMINAL, JACKSONVILLE, FLA.

MISSISSIPPI  
DIVISION



<b>ViroGroup</b>	<i>AIR • WATER • SOIL TECHNOLOGY</i>		
	DRN. BY: MTA	DWG. NO. 94J0988	DATE: 11-01-94
PROJECT NAME: NORTH FLORIDA SHIPYARDS		NUMBER: 04-01943.05	
		MISSISSIPPI DIVISION	

FIGURE 4-1. SITE PLAN



<b>ViroGroup</b>	<i>AIR • WATER • SOIL TECHNOLOGY</i>		<b>MISSIMER DIVISION</b>	
	DRN. BY: MTA	DWG. NO. 94J1059		DATE: 11-03-94
	PROJECT NAME: NORTH FLORIDA SHIPYARDS, INC.			NUMBER: 04-01943.05

FIGURE 4-2. TYPICAL MONITORING WELL CONSTRUCTION DIAGRAM.



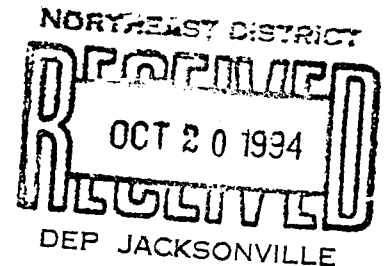




Missimer Division  
ViroGroup, Inc.  
8130 Baymeadows Way West  
Suite 104  
Jacksonville, FL 32256  
Phone 904-448-6400  
FAX 904-448-8556

October 20, 1994

Mr. Stanley Tam  
Florida Department of Environmental Protection  
Northeast District  
7825 Baymeadows Way  
Suite 200B  
Jacksonville, Florida 32256-7577



Subject: Verification of Quality Assurance Plan Approvals, North  
Florida Shipyards, Commodores Point Facility  
ViroGroup Project No. 04-01943.05

Dear Mr Tam:

On behalf of North Florida Shipyards, Inc., ViroGroup, Inc. is pleased to provide verification of approval of its own Comprehensive Quality Assurance (QA) Plan (attached). In addition, attached is verification of approval of the QA plan for our proposed laboratory; Savannah Laboratories and Environmental Services, Inc. (Savannah). The attached information should be sufficient to meet the requirements of the Deferred Prosecution Agreement, Exhibit 5 - Preliminary Contamination Assessment Actions. If you have any questions, or require additional information, please feel free to call.

Sincerely,

VIROGROUP, INC., MISSIMER DIVISION

James P. Oliveros, P.G.  
Senior Hydrogeologist

cc: Richard L. Maguire - Rogers, Towers  
John Shiffert - North Florida Shipyards



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

May 11, 1994

Susan Blacketer  
ViroGroup, Inc./Missimer Division  
428 Pine Island Road, SW  
Cape Coral FL 33991

**SUBJECT: Quality Assurance Review; ViroGroup, Inc./Missimer  
Division Comprehensive QA Plan #870468  
Amendment to an approved document**

Dear Susan:

The referenced document pages, received on January 26, 1994, have been reviewed and approved. All comments on the annotated pages and review checklist items, must be incorporated into your procedures immediately as a condition of this approval. Further detail on the status of this plan is explained in the enclosed guidance document (DER QAS #90-03).

This approval is applicable to the following sampling capabilities:

- \* Surface Water
- \* Wastewater
- \* Groundwater
- \* Air Stripper & Remedial Treatment Systems
- \* Wells with in-place plumbing
- \* Soil
- \* Domestic waste sludges
- \* Sludges- Solid and hazardous wastes
- \* Liquid hazardous waste
- \* Drinking water supply systems
- \* Temporary well points
- \* Potable well
- \* Sediment

The attached review checklist is being used for the actual review of your QA Plan, although additional review comments may be included in future reviews in order to clarify items in the checklist.

Checklist comments that have an "N" designated in the blank space indicates incorrect, incomplete, or missing information. These checklist items require discussion and/or clarification when revising your plan. Checklist comments that have an "Y" or "√" designated in the blank space indicates that the information included in the plan is present and correct, and no further revision is required.

Checklist comments designated as not applicable "NA" indicates information that is not required because the capability is not apparent in the CompQAP. If your company wants approval for capabilities listed as "NA", sufficient information must be included (and approved) in your plan. Question marks (?) indicate information that may or may not be applicable (unable to determine in the review) and must be clarified in revisions to your plan.

Letter to Susan Blacketer  
May 11, 1994  
Page Two of Two

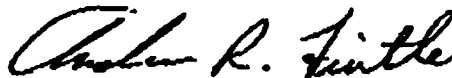
Checklist items specified as rejectable ("R") in the first column on the left hand side of the checklist indicate the comments that must be addressed before approval or approval pending status may be considered. If any of the checklist items are marked "N" for a rejectable item ("R"), the QA plan will be returned unapproved.

Checklist items specified as approved-pending information ("AP") indicate comments that also must be addressed. Although the omission of several of these types of items will allow an approved-pending status of the plan, a significant number of incorrect or missing items will require the plan to be returned unapproved.

Your next set of required annual amendments must include revisions that incorporate and/or address all comments on the annotated pages and the review checklist items. Amendments must be received by the QA Section on or before January 26, 1995, 30 days before approval date.

If you have any questions concerning this matter, please call Debbie Koren at (904) 488-2796.

Sincerely,



Sylvia S. Labie, QA Officer  
Quality Assurance Section

SSL/DSK/dsk

Attachments (3): DER QAS #90-03 (Explanation of Status)  
Copy of Annotated CompQAP Pages  
Copy of Annotated Review Checklist Field Only

cc: CompQAP #870468

# SL SAVANNAH LABORATORIES & ENVIRONMENTAL SERVICES, INC.

2845 Industrial Plaza Drive (32301) • P.O. Box 13056 • Tallahassee, FL 32317-3056 • (904) 878-3994 • Fax (904) 878-9504

### FAX TRANSMITTAL MEMO

TO: Name Mr. Ralph Noyillo FROM: Name: LAURA SNEAD  
 Company Viss Corp. Inc. Location TALLAHASSEE  
 Location \_\_\_\_\_ Date 10/17/94  
 FAX# 22 Total Pages 2

MESSAGE St. Corp OAP # 890142 G Approval

page  
Ralph - This is the last dated signed  
approval page. We have submitted revisions to  
the OAP dated 5/94 + 9/94 which we are

*Presently operating under.  
 Please let me know if you need  
 a copy. Sincerely, Laura*

# COMPREHENSIVE QUALITY ASSURANCE PLAN

Prepared by and for:  
SAVANNAH LABORATORIES AND ENVIRONMENTAL SERVICES, INC.

## APPROVED

### SAVANNAH DIVISION

Janette D. Long  
Janette D. Long  
Consultant Manager

9-16-92  
Date

Alan C. Bailey  
Alan C. Bailey  
Consultant QA Officer

9-16-92  
Date

### TALLAHASSEE DIVISION

Janet B. Pruitt  
Janet B. Pruitt  
Consultant Manager

9-24-92  
Date

Elizabeth L. Schneider  
Elizabeth L. Schneider  
Consultant QA Officer

9/24/92  
Date

### TAMPA BAY DIVISION

Kathy Sheffield  
Kathy Sheffield  
Consultant Manager

9-23-92  
Date

Inas M. Sobky  
Inas M. Sobky  
Consultant QA Officer

9-23-92  
Date

### MOBILE DIVISION

Jesse L. Smith  
Jesse L. Smith  
Consultant Manager

9-21-92  
Date

Michele H. Lersch  
Michele H. Lersch  
Consultant QA Officer

9-21-92  
Date

### DEERFIELD BEACH DIVISION

Paul Canevaro  
Paul Canevaro  
Consultant Manager

9-17-92  
Date

Kathy C. Arminger  
Kathy C. Arminger  
Consultant QA Officer

9-17-92  
Date

Sylvia S. Lable  
Sylvia S. Lable  
FDER QA Officer

4-6-93  
Date

Section 2  
Revision 1  
Date: 9/94  
Page 1 of 4

## 2.0 TABLE OF CONTENTS

SECTION		NUMBER OF PAGES	REV.	DATE
1.0	Title and Signature Page	1	1	5/94
2.0	Table of Contents	4	1	5/94
3.0	Statement of Policy	1	1	5/94
4.0	Project Organization and Responsibility	11	1	5/94
5.0	Quality Assurance Objectives (Precision, Accuracy, and MDLs)	115	1	9/94
6.0	Sampling Procedures	25	1	5/94
7.0	Sample Custody	21	1	5/94
8.0	Analytical Procedures	8	1	5/94
9.0	Calibration Procedures and Frequency	19	1	5/94
10.0	Preventive Maintenance	7	1	5/94
11.0	Quality Control Checks and Routines To Assess Precision and Accuracy and Calculations of Method Detection Limits	10	1	5/94
12.0	Data Reduction, Review and Reporting	31	1	5/94
13.0	Corrective Action	4	1	5/94
14.0	Performance and System Audits	5	1	5/94
15.0	Quality Assurance Reports	2	1	5/94

Section 2  
Revision 1  
Date: 9/94  
Page 2 of 4

## LIST OF FIGURES

FIGURE DESCRIPTION	PAGE	REVISION	DATE
4.1 Corporate Organizational Structure	4.5	1	5/94
4.2 Organizational Structure of Savannah Division Laboratory	4.6	1	5/94
4.3 Organizational Structure of Tallahassee Division Laboratory	4.7	1	5/94
4.4 Organizational Structure of Mobile Division Laboratory	4.8	1	5/94
4.5 Organizational Structure of Deerfield Beach Division Laboratory	4.9	1	5/94
4.6 Organizational Structure of Tampa Bay Division Laboratory	4.10	1	5/94
4.7 Organizational Structure of New Orleans Division Laboratory	4.11	1	5/94
6.1 Sample and Container Label	6.18	1	5/94
6.2 Monitoring Well Sampling Log Form	6.19	1	5/94
6.3 Custody Form	6.20	1	5/94
7.1 Custody Form	7.2	1	5/94
7.2 Sample and Container Label	7.3	1	5/94
7.3 Container Preparation Log	7.5	1	5/94
7.4 Custody Seal	7.6	1	5/94
7.5 Sample Custody Excursion	7.7	1	5/94
7.6 Sample Registry Form	7.9	1	5/94
7.7 Cooler Receipt Form	7.12	1	5/94
7.8 Sample Container Request Form (obverse)	7.13	1	5/94
7.9 Sample Container Request Form (reverse)	7.14	1	5/94
7.10 Fluoride Extraction Log	7.16	1	5/94
7.11 Fluoride Analysis Log	7.17	1	5/94
7.12 Semivolatile Extract Custody Log	7.18	1	5/94

Section 2  
Revision 1  
Date: 9/94  
Page 3 of 4

FIGURE DESCRIPTION	PAGE	REVISION	DATE
11.1 Quality Control Chart - Accuracy (% Recovery)	11.8	1	5/94
11.2 Quality Control Chart - Precision (% RPD)	11.9	1	5/94
12.1 Flow Diagram of Computerized Laboratory Information Management Systems (LIMS)	12.2	1	5/94
12.2 Result Only Report	12.11	1	5/94
12.3 SL Level I Report	12.16	1	5/94
12.4 SL Level II Report	12.23	1	5/94
13.1 Nonconformance Report (NCR) Form	13.3	1	5/94
14.1 Laboratory Internal Systems Audit Checklist	14.3	1	5/94
14.2 Field Internal Systems Audit Checklist	14.4	1	5/94



Section 2  
Revision 1  
Date: 9/94  
Page 4 of 4

## LIST OF TABLES

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5.1 Analytical Methods and Quality Assurance Objectives for Water	5.3	1	9/94
5.2 Analytical Methods and Quality Assurance Objectives for Soils and Sediments	5.75	1	9/94
5.3 Field Methods and Quality Assurance Objectives	5.111	1	9/94
6.1 Container Preservation Techniques and Holding Times for Water Samples	6.8	1	5/94
6.2 Container Preservation Techniques and Holding Times for Soil or Sediment Samples	6.14	1	5/94
6.3 Approved Water and Wastewater Procedures, Containers, Preservation and Holding Times for Parameters Not Found in 40 CFR 136	6.15	1	5/94
6.4 Field Reagent Storage and Transport	6.21	1	5/94
8.1 Reagent Storage	8.5	1	5/94
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9.1 Laboratory Instruments	9.2	1	5/94
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9.3 Standard Source and Preparation	9.7	1	5/94
9.4 Standardization of Titrating Solutions	9.10	1	5/94
10.1 Laboratory Equipment Preventive Maintenance Schedule	10.2	1	5/94
10.2 Field Equipment Preventive Maintenance Schedule	10.6	1	5/94
10.3 Balance Calibration Checks	10.7	1	5/94
11.1 Methods Used to Generate Accuracy and Precision Targets	11.10	1	5/94
12.1 Summary of Equations Used in Calculations	12.4	1	5/94
13.1 Corrective Action	13.4	1	5/94

ROGERS, TOWERS, BAILEY, JONES & GAY

A PROFESSIONAL ASSOCIATION  
ATTORNEYS AT LAW  
1301 RIVERPLACE BOULEVARD  
SUITE 1500  
JACKSONVILLE, FLORIDA 32207

TELEPHONE (904) 398-3911  
FAX (904) 396-0663

WM. H. ROGERS - 1884-1967  
CHARLES D. TOWERS - 1894-1969  
CECIL C. BAILEY - 1901-1992  
TAYLOR JONES - 1911-1982  
J. EDWIN GAY - 1909-1994

November 2, 1994

CHARLES D. TOWERS, JR.  
JAMES M. McLEAN  
FRED M. RINGEL  
DAVID M. FOSTER  
C. WILLIAM REINEY  
CLYDE A. REESE, JR.  
ALLAN T. GEIGER  
SAMUEL L. LePRELL  
G. KENNETH NORRIS  
DOUGLAS A. WARD  
PAUL P. SANFORD  
IRVIN M. WEINSTEIN  
ROBERT T. HYDE, JR.  
H. JOSEPH O'SHIELDS  
DONALD C. WRIGHT  
JOSEPH O. STROUD, JR.  
RICHARD B. SCHWALBE  
WILLIAM H. SCHRODER, JR.  
MICHAEL A. WODRICH  
CECILE BAILEY EVANS  
E. ALLEN HIEB, JR.  
J. KIRBY CHRITTON  
T.R. HAINLINE, JR.  
JEFFREY C. REGAN  
CHRISTOPHER C. HAZELIP

SUSAN C. McDONALD  
BETSY COX MAHIN  
ANTHONY A. ANDERSON  
FRED D. FRANKLIN, JR.  
MARCIA PENMAN PARKER  
ANDREW KEITH DAW  
ANNE K. BUZBY  
LEONARDO J. MAIMAN  
KURT H. DUNKLE  
RICHARD L. MAGUIRE  
JAMES M. RILEY  
MARK M. ARNOLD  
C. DAVIS ELY  
RICK MONTE REZNICSEK  
KATHY JACOBS TAYON  
WILLIAM A. O'LEARY  
REGINA L. ALBERINI  
EMILY G. PIERCE  
GREGORY F. LUNNY  
CLINTON A. WRIGHT, III  
A. BARRY GROSSE  
JOHN R. IBACH  
BARBARA PUESTOW  
CHERYL L. WORMAN  
MARGARET M. BURNETT

TALLAHASSEE OFFICE  
108 SOUTH MONROE STREET  
TALLAHASSEE, FLORIDA 32302  
(904) 222-7200  
FAX (904) 222-7204

FRANK L. JONES

GOVERNMENTAL CONSULTANT:  
MARVIN ARRINGTON

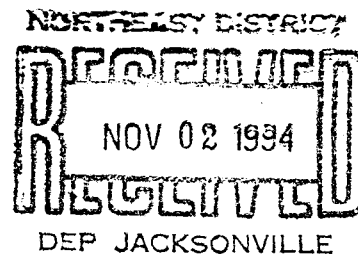
ATLANTA OFFICE  
PEACHTREE CENTRE, SUITE 900  
230 PEACHTREE STREET, NW  
ATLANTA, GEORGIA 30303  
(404) 577-0900  
FAX (404) 577-0930

SPECIAL COUNSEL  
HOWARD I. KORMAN  
ALFRED J. POMERANZ

WRITER'S DIRECT DIAL NUMBER:  
(904) 346-5564

BY HAND DELIVERY

Ashwin Patel  
Hazardous Waste Supervisor  
Department of Environmental Protection  
Northeast District  
7825 Baymeadows Way, Suite B-200  
Jacksonville, FL 32256-7577



RE: Deferred Prosecution Agreement /  
North Florida Shipyards, Inc.  
Our File No: N0127-14972

Dear Mr. Patel:

In accordance with Paragraph 5 of the Deferred Prosecution Agreement, enclosed is an Affidavit concerning waste disposal sites. If you have any questions, please do not hesitate to contact me.

Sincerely,

*Richard L. Maguire*  
Richard L. Maguire

RLM:rsf  
Enclosure

cc: Mr. John Shiffert (w/encl.)  
Mr. Joe Shiffert (w/encl.)  
Crystal Broughan (w/encl.)  
Michael Fitzsimmons (w/encl.)

BUCKET # 94-10

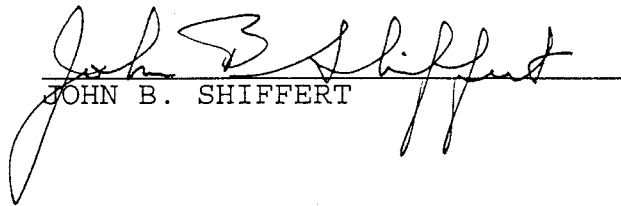
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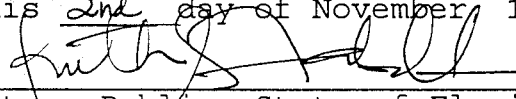
STATE OF FLORIDA     )  
COUNTY OF DUVAL     )

BEFORE ME, the undersigned authority in and for said State and County, this day personally appeared John B. Shiffert, an officer of North Florida Shipyards, Inc., who being by me first duly sworn, and says the following is true, to the best of his knowledge:

1. I am John B. Shiffert, Vice President of North Florida Shipyards, Inc.
2. I am familiar with the disposal practices of North Florida Shipyards, Inc. for the period that I have worked at the facility.
3. To the best of my knowledge, other than the sites identified in the Defered Prosecution Agreement, permitted landfills for dispoal of commercial waste, and permitted hazardous waste disposal facilities for the disposal of hazardous wastes, I am not aware of North Florida Shipayrds, Inc. shipping any wastes to any other disposal site.

  
 \_\_\_\_\_  
 JOHN B. SHIFFERT

Sworn to and subscribed before me this 2nd day of November, 1994.

  
 \_\_\_\_\_  
 Notary Public, State of Florida  
 My Commission Expires: \_\_\_\_\_



**RUTH S. FABELLA**  
 MY COMMISSION # CC300897 EXPIRES  
 July 11, 1997  
 BONDED THRU TROY FAIN INSURANCE, INC.



# Department of Environmental Protection

Lawton Chiles  
Governor

Northeast District  
7825 Baymeadows Way, Suite B200  
Jacksonville, Florida 32256-7590

Virginia B. Wetherell  
Secretary

October 25, 1994

Mr. John Shiffert  
North Florida Shipyards, Inc.  
P.O. Box 3255  
Jacksonville, FL 32206

Dear Mr. Shiffert:

North Florida Shipyards, Inc. - Commodores Point  
FLD 982 121 329  
OGC #91-20752  
Duval County - Hazardous Waste

Your request for a seven (7) day extension for the submittal of the Preliminary Contamination Assessment Plan (PCAP) for the above referenced facility is granted. Please note that the PCAP must be submitted to the Department no later than November 4, 1994.

If you have any questions, please contact me at the letterhead address or call (904)448-4320, extension 381.

Sincerely,

*Stanley Tam*  
Stanley Tam  
Hazardous Waste Engineer

*VC*  
ST:st

cc: Jim Oliveros  
Rich Maguire



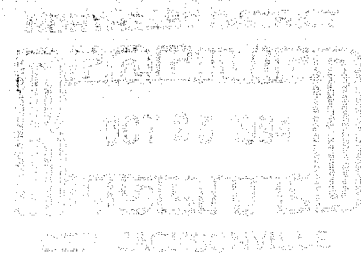
Missimer Division  
ViroGroup, Inc.

8130 Baymeadows Way West  
Suite 104  
Jacksonville, FL 32256  
Phone 904-448-6400  
FAX 904-448-8556

MSB  
V  
SCT

October 24, 1994

Mr. Ashwin Patel  
Florida Department of Environmental Protection  
Northeast District  
7825 Baymeadows Way  
Suite 200B  
Jacksonville, Florida 32256-7577



**Subject: Extension Request, Preliminary Contamination Assessment,  
North Florida Shipyards, Commodores Point Facility  
ViroGroup Project No. 04-01943.05**

Dear Mr Patel:

On behalf of North Florida Shipyards, Inc., ViroGroup, Inc. requests a 7-day extension for submittal of the preliminary contamination assessment plan (PCAP) for the Commodores Point facility. As discussed in our meeting today, we put preparation of the PCAP on temporary hold thinking that you wanted to see the facility before the PCAP was submitted. The new submittal deadline would be Friday, November 4, 1994. If you have any questions, or require additional information, please feel free to call.

Sincerely,

VIROGROUP, INC., MISSIMER DIVISION

James P. Oliveros, P.G.  
Senior Hydrogeologist

cc: John Shiffert - North Florida Shipyards, Inc.  
Richard L. Maguire - Rogers, Towers  
Barry Robertson - ViroGroup, Inc.



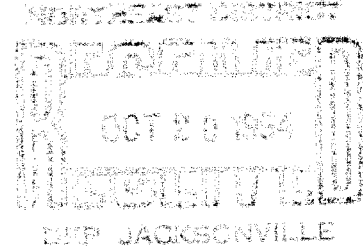
Missimer Division  
ViroGroup, Inc.

8130 Baymeadows Way West  
Suite 104  
Jacksonville, FL 32256  
Phone 904-448-6400  
FAX 904-448-8556

ABP  
✓

October 20, 1994

Mr. Stanley Tam  
Florida Department of Environmental Protection  
Northeast District  
7825 Baymeadows Way  
Suite 200B  
Jacksonville, Florida 32256-7577



**Subject: Verification of Quality Assurance Plan Approvals, North  
Florida Shipyards, Commodores Point Facility  
ViroGroup Project No. 04-01943.05**

Dear Mr Tam:

On behalf of North Florida Shipyards, Inc., ViroGroup, Inc. is pleased to provide verification of approval of its own Comprehensive Quality Assurance (QA) Plan (attached). In addition, attached is verification of approval of the QA plan for our proposed laboratory; Savannah Laboratories and Environmental Services, Inc. (Savannah). The attached information should be sufficient to meet the requirements of the Deferred Prosecution Agreement, Exhibit 5 - Preliminary Contamination Assessment Actions. If you have any questions, or require additional information, please feel free to call.

Sincerely,

VIROGROUP, INC., MISSIMER DIVISION

James P. Oliveros, P.G.  
Senior Hydrogeologist

cc: Richard L. Maguire - Rogers, Towers  
John Shiffert - North Florida Shipyards

DOCKET # 94-97



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

May 11, 1994

Susan Blacketer  
ViroGroup, Inc./Missimer Division  
428 Pine Island Road, SW  
Cape Coral FL 33991

**SUBJECT: Quality Assurance Review; ViroGroup, Inc./Missimer  
Division Comprehensive QA Plan #870468  
Amendment to an approved document**

Dear Susan:

The referenced document pages, received on January 26, 1994, have been reviewed and approved. All comments on the annotated pages and review checklist items, must be incorporated into your procedures immediately as a condition of this approval. Further detail on the status of this plan is explained in the enclosed guidance document (DER QAS #90-03).

This approval is applicable to the following sampling capabilities:

- \* Surface Water
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- \* Wells with in-place plumbing
- \* Soil
- \* Domestic waste sludges
- \* Sludges- Solid and hazardous wastes
- \* Liquid hazardous waste
- \* Drinking water supply systems
- \* Temporary well points
- \* Potable well
- \* Sediment

The attached review checklist is being used for the actual review of your QA Plan, although additional review comments may be included in future reviews in order to clarify items in the checklist.

Checklist comments that have an "N" designated in the blank space indicates incorrect, incomplete, or missing information. These checklist items require discussion and/or clarification when revising your plan. Checklist comments that have an "Y" or "√" designated in the blank space indicates that the information included in the plan is present and correct, and no further revision is required.

Checklist comments designated as not applicable "NA" indicates information that is not required because the capability is not apparent in the CompQAP. If your company wants approval for capabilities listed as "NA", sufficient information must be included (and approved) in your plan. Question marks (?) indicate information that may or may not be applicable (unable to determine in the review) and must be clarified in revisions to your plan.

Letter to Susan Blacketer  
May 11, 1994  
Page Two of Two

Checklist items specified as rejectable ("R") in the first column on the left hand side of the checklist indicate the comments that must be addressed before approval or approval pending status may be considered. If any of the checklist items are marked "N" for a rejectable item ("R"), the QA plan will be returned unapproved.

Checklist items specified as approved-pending information ("AP") indicate comments that also must be addressed. Although the omission of several of these types of items will allow an approved-pending status of the plan, a significant number of incorrect or missing items will require the plan to be returned unapproved.

Your next set of required annual amendments must include revisions that incorporate and/or address all comments on the annotated pages and the review checklist items. Amendments must be received by the QA Section on or before January 26, 1995, 30 days before approval date.

If you have any questions concerning this matter, please call Debbie Koren at (904) 488-2796.

Sincerely,



Sylvia S. Labie, QA Officer  
Quality Assurance Section

SSL/DSK/dsk

Attachments (3): DER QAS #90-03 (Explanation of Status)  
Copy of Annotated CompQAP Pages  
Copy of Annotated Review Checklist Field Only

cc: CompQAP #870468



**SL SAVANNAH LABORATORIES & ENVIRONMENTAL SERVICES, INC.**

2846 Industrial Plaza Drive (32301) • P.O. Box 13056 • Tallahassee, FL 32317-3056 • (904) 878-3994 • Fax (904) 878-9504

FAX TRANSMITTAL MEMO

TO: Name Mr. Ralph Magillo FROM: Name: LAURA SNEAD  
 Company Vas Corp. Inc. Location TALLAHASSEE  
 Location \_\_\_\_\_ Date 10/17/94  
 FAX# 22 Total Pages 2

MESSAGE Sl. Comp OAPP # 890142.G Approval

pay  
Ralph - This is the best dated signed  
approval page. We have submitted revisions to  
the OAPP dated 5/94 + 9/94 which we are

*presently operating under.  
 Please let me know if you need  
 a copy. Sincerely, Laura*

# COMPREHENSIVE QUALITY ASSURANCE PLAN

Prepared by and for:

SAVANNAH LABORATORIES AND ENVIRONMENTAL SERVICES, INC.

## APPROVED

### SAVANNAH DIVISION

Janette D. Long  
Janette D. Long  
Consultant Manager

9-16-92  
Date

Alan C. Bailey 9-16-92  
Alan C. Bailey  
Consultant QA Officer Date

### TALLAHASSEE DIVISION

Janet B. Pruitt  
Janet B. Pruitt  
Consultant Manager

9-24-92  
Date

Elizabeth L. Schneider 9/24/92  
Elizabeth L. Schneider  
Consultant QA Officer Date

### TAMPA BAY DIVISION

Kathy Sheffield  
Kathy Sheffield  
Consultant Manager

9-23-92  
Date

Inas M. Sobky 9-23-92  
Inas M. Sobky  
Consultant QA Officer Date

### MOBILE DIVISION

Jesse L. Smith  
Jesse L. Smith  
Consultant Manager

9-21-92  
Date

Michele H. Lersch 9-21-92  
Michele H. Lersch  
Consultant QA Officer Date

### DEERFIELD BEACH DIVISION

Paul Canevaro  
Paul Canevaro  
Consultant Manager

9-17-92  
Date

Kathy C. Arminger 9-17-92  
Kathy C. Arminger  
Consultant QA Officer Date

Sylvia S. Lable  
Sylvia S. Lable  
FDER QA Officer

4-6-93  
Date

## 2.0 TABLE OF CONTENTS

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2.0	Table of Contents	4	1	5/94
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4.0	Project Organization and Responsibility	11	1	5/94
5.0	Quality Assurance Objectives (Precision, Accuracy, and MDLs)	115	1	9/94
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9.0	Calibration Procedures and Frequency	19	1	5/94
10.0	Preventive Maintenance	7	1	5/94
11.0	Quality Control Checks and Routines To Assess Precision and Accuracy and Calculations of Method Detection Limits	10	1	5/94
12.0	Data Reduction, Review and Reporting	31	1	5/94
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Section 2  
Revision 1  
Date: 9/94  
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4.5 Organizational Structure of Deerfield Beach Division Laboratory	4.9	1	5/94
4.6 Organizational Structure of Tampa Bay Division Laboratory	4.10	1	5/94
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7.6 Sample Registry Form	7.9	1	5/94
7.7 Cooler Receipt Form	7.12	1	5/94
7.8 Sample Container Request Form (obverse)	7.13	1	5/94
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Revision 1  
Date: 9/94  
Page 3 of 4

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Revision 1  
Date: 9/94  
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13.1 Corrective Action	13.4	1	5/94

ROGERS, TOWERS, BAILEY, JONES & GAY

A PROFESSIONAL ASSOCIATION  
ATTORNEYS AT LAW  
1301 RIVERPLACE BOULEVARD  
SUITE 1500  
JACKSONVILLE, FLORIDA 32207

CHARLES D. TOWERS, JR.  
JAMES M. McLEAN  
FRED M. RINGEL  
DAVID M. FOSTER  
C. WILLIAM REINEY  
CLYDE A. REESE, JR.  
ALLAN T. GEIGER  
SAMUEL L. LoPRELL  
G. KENNETH NORRIE  
DOUGLAS A. WARD  
PAUL P. SANFORD  
IRVIN M. WEINSTEIN  
ROBERT T. HYDE, JR.  
H. JOSEPH O'SHIELDS  
DONALD C. WRIGHT  
JOSEPH O. STROUD, JR.  
RICHARD B. SCHWALBE  
WILLIAM H. SCHRODER, JR.  
MICHAEL A. WOODRICH  
CECILE BAILEY EVANS  
E. ALLEN HIEB, JR.  
J. KIRBY CHRITTON  
T.R. HAINLINE, JR.  
JEFFREY C. REGAN  
CHRISTOPHER C. HAZELIP

SUSAN C. McDONALD  
BETSY COX MAHIN  
ANTHONY A. ANDERSON  
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ANDREW KEITH DAW  
ANNE K. BUZBY  
LEONARDO J. MAIMAN  
KURT H. DUNKLE  
RICHARD L. MAGUIRE  
JAMES M. RILEY  
MARK M. ARNOLD  
C. DAVIS ELY  
RICK MONTE REZNICSEK  
KATHY JACOBS TAYON  
WILLIAM A. O'LEARY  
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EMILY G. PIERCE  
GREGORY F. LUNNY  
CLINTON A. WRIGHT, III  
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JOHN R. IBACH  
BARBARA PUESTOW  
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MARGARET M. BURNETT

TELEPHONE (904) 398-3911  
FAX (904) 396-0663

WM. H. ROGERS - 1884-1987  
CHARLES D. TOWERS - 1894-1989  
CECIL C. BAILEY - 1901-1992  
TAYLOR JONES - 1911-1982  
J. EDWIN GAY - 1909-1994

October 13, 1994

TALLAHASSEE OFFICE  
106 SOUTH MONROE STREET  
TALLAHASSEE, FLORIDA 32302  
(904) 222-7200  
FAX (904) 222-7204

FRANK L. JONES

GOVERNMENTAL CONSULTANT:  
MARVIN ARRINGTON

ATLANTA OFFICE  
PEACHTREE CENTRE, SUITE 900  
230 PEACHTREE STREET, NW  
ATLANTA, GEORGIA 30303  
(404) 577-0900  
FAX (404) 577-0930

SPECIAL COUNSEL  
HOWARD I. KORMAN  
ALFRED J. POMERANZ

WRITER'S DIRECT DIAL NUMBER:  
(904) 346-5564

BY HAND DELIVERY

Ashwin Patel  
Hazardous Waste Supervisor  
Department of Environmental Protection  
Northeast District  
7825 Baymeadows Way, Suite B-200  
Jacksonville, FL 32256-7577

NORTHEAST DISTRICT  
RECEIVED  
OCT 13 1994  
RECEIVED  
DEP JACKSONVILLE

RE: North Florida Shipyards, Inc.  
Our File No: N0127-14972

Dear Mr. Patel:

Exhibits 3 and 4 (Recommended Corrective Actions) of the Deferred Prosecution Agreement require that North Florida Shipyards, Inc. perform certain actions within certain time periods. Set forth below is a report on the actions taken to date. Also, enclosed are certain documents required by the Agreement.

North Florida Shipyards, Exhibit 3

1. 40 C.F.R. 262.11:

As discussed with you, the wastepaint filters were previously analyzed. A copy of those results is attached as Attachment 1. The required VOC analysis had not been conducted because of the laboratory's advice that volatiles are not associated with dried paint.

Also attached is documentation of the monthly generation rate of the spent paint/MEK waste.

2. 40 C.F.R. 262.23(a)(2)(b):

All drums have been properly marked with the accumulation date, and none have or will be accumulated over 180 days.

DOCKET # 94-6

ROGERS, TOWERS, BAILEY, JONES & GAY

October 13, 1994

Page 2

3. 40 C.F.R. 262.34(d)(5)(ii):

Attachment 2 is the Modified Contingency Plan which has been posted.

4. 40 C.F.R. 262(D)(5)(iii):

All employees have received the required training to ensure that they are thoroughly familiar with proper waste handling in emergency procedures relevant to their responsibilities during normal facility operations and emergencies. Copies of the training records are kept on file for review in the Safety Office.

5. 40 C.F.R. 262.35:

Aisle space has been provided around all drums.

6. 40 C.F.R. 265, Subpart C:

The appropriate arrangements have been made with local police, fire departments and emergency response teams, as well as local hospitals, state emergency response teams, emergency response contractors, and equipment suppliers. See Attachment 3.

7. 40 C.F.R. 265.174:

The hazardous waste inspection log has been previously submitted and approved by the Department's Northeast District Office. Weekly drum inspections have been documented and filed. See Attachment 4.

Buffalo Electric, Exhibit 4

1. 40 C.F.R. 262.11:

North Florida Shipyards has retained ViroGroup, Inc. to conduct the necessary sampling and analysis. The procedure for such sampling and analysis was previously forwarded to the Department on October 12, 1994 for approval.

2. 40 C.F.R. 262.12(a):

The facility has obtained its own EPA identification number. See Attachment 5.

When the sampling and analysis of grit piles at Buffalo Electric has been completed, North Florida Shipyards will have completed all of the Recommended Corrective Actions described in Exhibits 3 and 4. If



ROGERS, TOWERS, BAILEY, JONES & GAY

October 13, 1994

Page 3

any of the actions taken to date are not sufficient or not in compliance with the requirements of Exhibits 3 and 4, please advise.

Also, if you have any questions, please do not hesitate to contact me.

Sincerely,

  
Richard L. Maguire

RLM:rsf

Enclosures:

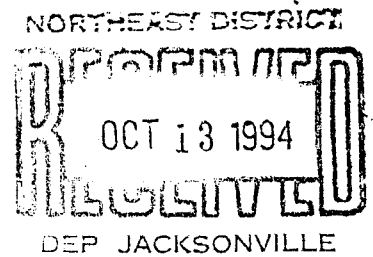
cc: Mr. John Shiffert (w/o encls.)  
Mr. Joe Shiffert (w/o encls.)  
Crystal Broughan (w/encls.)

# FIRST COAST ENVIRONMENTAL LABORATORY, INC.

November 18, 1993

Client: North Florida Shipyard  
Sample I.D.: Commodores Points  
Sample Matrix: Paint Booth Filter

Lab #: 9311-81  
Date Received: 11-9-93  
Date Completed: 11-17-93

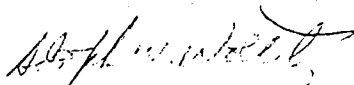


## Metals Analytical Summary Toxicity Characteristic Leaching Procedure SW-846 Method 1311

<u>Parameter</u>	<u>SW-846 Method</u>	<u>CAS #</u>	<u>Detection Limit(mg/L)</u>	<u>RESULT(mg/L)</u>	<u>Max. Cont. Level(mg/L)</u>
Barium	6010	7440-39-3	0.00454	0.344	100.0
Cadmium	6010	7440-43-9	0.00532	0.024	1.0
Chromium	6010	7440-47-3	0.0140	0.049	5.0
Lead	6010	7439-92-1	0.0307	0.100	5.0

SW-846 -- "Test Methods for Evaluating Solid Waste", Third Edition, November, 1986, and Revision 1, December, 1987, and 55 FR (61) 11862 - 11875.

Respectfully submitted,



Adolph W. Wollitz  
Laboratory Director  
FHRS Lab #E82102  
FHRS Lab #82110  
EPA #FL062  
DEP Comp QAPP # 870222G

AWW/tp

Attachment 1

8818 Arlington Expressway • Jacksonville, Florida 32211  
(904) 725-4847 • Fax (904) 725-2215

NORTH FLORIDA SHIPYARD  
COMMODORES POINT

OCT 5, 1994

SPENT PAINT/MEK WASTE

9/93	0
10/93	185 G
11/93	0
12/93	185 G
01/94	0
02/94	110 G
03/94	100 G
04/94	70 G
05/94	0
06/94	0
07/94	0
08/94	<u>165 G</u>
TOTAL	705 G

MONTHLY GENERATION RATE:

705/12=59 GALLONS

August 23, 1994

From: Personnel Director  
To: Telephone Operators  
Subj: Emergency Information

*Bob Present*

1. The Emergency Environmental Coordinator for Commodore's Point  
is: John Shiffert 635-6863  
all. Jim Becker 284-7248

Call these coordinators immediately in case of an environmental incident.

2. Spill kits are located in: the tool room  
the warehouse  
Paint and Labor Department

Emergency spill kits are also located in each division.

3. A list indicating the location of all fire extinguisher at Commodore's Point is attached. In the event of a fire, call the Fire Department at 911 and ensure that the fire extinguisher list is available in the event it is needed.

4. All telephone operators are responsible for reviewing this information on a monthly basis and ensuring that the phone numbers are posted clearly in the event of an emergency.

Copy to:  
Risk Manager  
Safety Director  
Security

EXTINGUISHER LOCATION:

EXTINGUISHER LOCATI

Shore power unit #1 & 2 D-bldg.

North Navy storage bldg.

Carpenter shop south door

Carpenter shop entry

Crane maint.

Crane maint. front door storeroom

Crane maint. office

Crane maint. office

Fire pump #1 main yard

Power station #2

A warehouse

Outside breakroom

#2 door A warehouse

Storeroom south end

Storeroom tow motor F-2

Storeroom

Outside storeroom office

Storeroom dock

Storeroom dock propane filling station

Storeroom dock propane filling station

Storeroom

Outside fab shop office

Tig welding booth

Fab shop by bender press

Pipe shop front door

Pipe shop back wall

Spray booth entry

Outside air compressor

Spray booth frnt area

Electric shop front door

Breakroom personnel office

Computer room personnel office

Computer room personnel office

#5 warehouse east wall

#5 warehouse north wall

#5 warehouse south wall

#5 warehouse south wall

#5 warehouse north wall center

#5 warehouse south wall center

#5 warehouse north wall

#5 warehouse paint sotrage

#5 warehouse

#5 warehouse west end

#5 warehouse behind office

#5 warehouse outside office

#5 warehouse center

Safety office

Safety office

Personnel office

Gas pump

Outside parts office @ Ind Mar

Electric shop back door

Electric shop outside lunchroom

Port Engineer's office downstairs

Coordinator's office upstairs

Power station #3

Machine shop front door

Machine shcp electric panel

Machine shop SW corner

Machine shop back wall

EXTINGUISHER LOCATION:	EXTINGUISHER LOCATION:
Paint & labor outside office	Parts department @ Ind Mar
Paint & labor back entrance	Parts department @ Ind Mar
Thermal engineering front door	Outside parts dept. @ Ind Mar
Thermal engineering back door	Breezeway south wall @ Ind Mar
Thermal engineering to work area	Breezeway south wall @ Ind Mar
Thermal engineering to parking lot	Breezeway south wall @ Ind Mar
Fire pump at warehouse C-1	Breezeway north wall @ Ind Mar
C-1 warehouse front door	Diesel shop @ time clock west wall
C-1 warehouse back door	Diesel shop south wall
C-2 warehouse back door	Diesel shop center
C-3 warehouse front door	Diesel shop by coke machine
C-3 warehouse back door	Diesel shop north wall
C-4 warehouse front door	Diesel shop south wall
D-1 warehouse front door	Diesel shop SPARE
D-2 warehouse front door	Diesel shop SPARE
D-2 warehouse back door	Diesel shop SPARE
D-4 warehouse back door	Injector shop @ Ind Mar
D-4 warehouse front door	Injector shop @ Ind Mar
Security main gate	Injector shop cleaning area
Old safety office	Truck shop south wall center
Security gate employee entrance	Truck shop north wall center
Machine shop grinding area	Crane #CR-14
Paint & labor front door	Crane #CR-14
Paint & labor break area	Truck T-37
Crane #736	Crane #CR-11
Forklift #F-6	Crane #CR-19
Lady December wheelhouse	Ind Mar Van T-78
Lady December galley	Tow motor F-10
Lady December engine room	Truck T-77
Lady December engine room	



# NORTH FLORIDA SHIPYARD, INC.

COMMODORES POINT — ADMINISTRATIVE OFFICE  
P. O. BOX 3255  
JACKSONVILLE, FLORIDA 32206

28 April 1994

City of Jacksonville  
Fire and Rescue Department  
Emergency Preparedness  
107 N. Market St.  
Jacksonville, FL 32202

NORTHEAST DISTRICT  
**RECEIVED**  
OCT 13 1994  
**RECEIVED**  
DEP JACKSONVILLE

Subj: Emergency Response Data Update

Dear Chief:

Attached are the current site maps, hazardous waste stream characterization, and inspection log forms that will assist in the event of an emergency release at North Florida Shipyard properties.

Any suggestions or recommendations concerning our preparedness for any contingency would be appreciated.

Cordially,

John Shiffert

jbs:wlb

cc: State Emergency Response Commission  
Local Emergency Planning Committee  
Marine Industrial Services  
Memorial Hospital Emergency Room

U.S. Department  
of Transportation

United States  
Coast Guard



Commanding Officer  
U. S. Coast Guard  
Marine Safety Office

31 Talleyrand Avenue  
Jacksonville, FL 32206-3497  
Staff Symbol:  
Phone: (904)232-2648

'91 JUN 20 PM 12 30

16450

JUN 13 1994

North Florida Shipyards  
5105 Buffalo Ave.  
Jacksonville, FL 32306

Gentlemen:

We have received, reviewed and accepted your response plan.

You are requested to immediately notify this office of significant changes in your plan including any change in the worst case discharge, oil spill removal organization, response procedures, or your operating area.

You are reminded as per Title 33 Code of Federal Regulations Part 154.1028 you must ensure the availability of response resources by contract or ownership to respond within one (01) hour of a spill.

If you have any questions, please mention control number OPA-21 in any future correspondence regarding your plan.

Sincerely,

A handwritten signature in cursive script that reads "A. Recalbuto".

A. RECALBUTO  
Captain, U. S. Coast Guard  
Captain of the Port  
Jacksonville, FL



MIS Marine Industrial Services, Inc.

FAKED  
3-22-93  
14:45  
TWI

P.O. Box 43175  
Jacksonville, FL  
32203-3175  
(904) 350-1062

March 22, 1993

North Florida Shipyard, Inc.  
P.O. Box 3255  
Jacksonville, FL. 32206

Attn: Mr. A. J. Becker

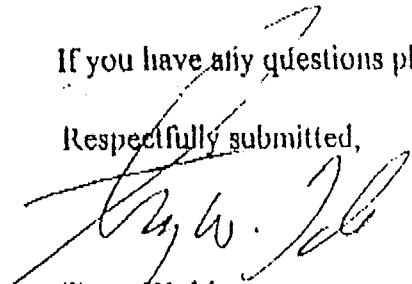
Sir,

Per my phone conversation with Mr. Wes Bunce on this date, Marine Industrial Services, Inc. shall be available for your needs for cleaning spills.

Per Mr. Bunce your worst case spill would be 6,000 gallons of product. Marine Industrial Services, Inc. per OPA-90 Regulations meets or exceeds the requirements to clean-up a 6,000 gallon spill. If M.I.S. was called out to handle a spill incident for you. We would work under the enclosed price sheet.

If you have any questions please feel free to call me (904) 350-1062

Respectfully submitted,

  
Terry W. Ide

CITY OF JACKSONVILLE  
CHIEF OF POLICE  
501 E. Bay St.  
Jacksonville, Florida 32202

5 Oct 94

NORTHEAST DISTRICT  
**RECEIVED**  
OCT 13 1994  
**RECEIVED**  
DEP JACKSONVILLE

REF: EMERGENCY RESPONSE DATA

Dear Chief:

Attached are the current site maps, hazardous waste stream characterization, and inspection log forms that will assist in the event of an emergency release at North Florida Shipyard / Commodores Point.


Any suggestions or recommendations concerning our preparedness for any contingency would be appreciated.

Cordially,

John B. Shiffert

jbs:wlb

Z 1A0 772 321

**Receipt for Certified Mail**  
No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

PS Form 3800, March 1993

Sent to Chief of Police City of Jacksonville	
Street and No. 501 E. Bay Street	
P.O., State and ZIP Code Jacksonville, FL 32202	
Postage	\$ 52
Certified Fee	1.00
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	1.00
TOTAL Postage & Fees	\$ 2.52
Postmark or Date	OCT 13 1994 USPO



# NORTH FLORIDA SHIPYARD, INC.

COMMODORES POINT — ADMINISTRATIVE OFFICE  
P. O. BOX 3255  
JACKSONVILLE, FLORIDA 32206

CITY OF JACKSONVILLE  
CHIEF OF POLICE  
501 E. Bay St.  
Jacksonville, Florida 32202

5 Oct 94

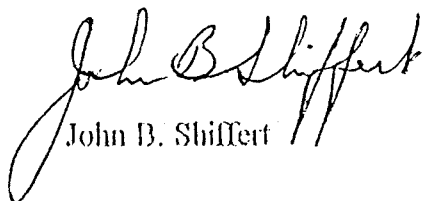
REF: EMERGENCY RESPONSE DATA

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Cordially,

  
John B. Shiffert

jbs:wlb

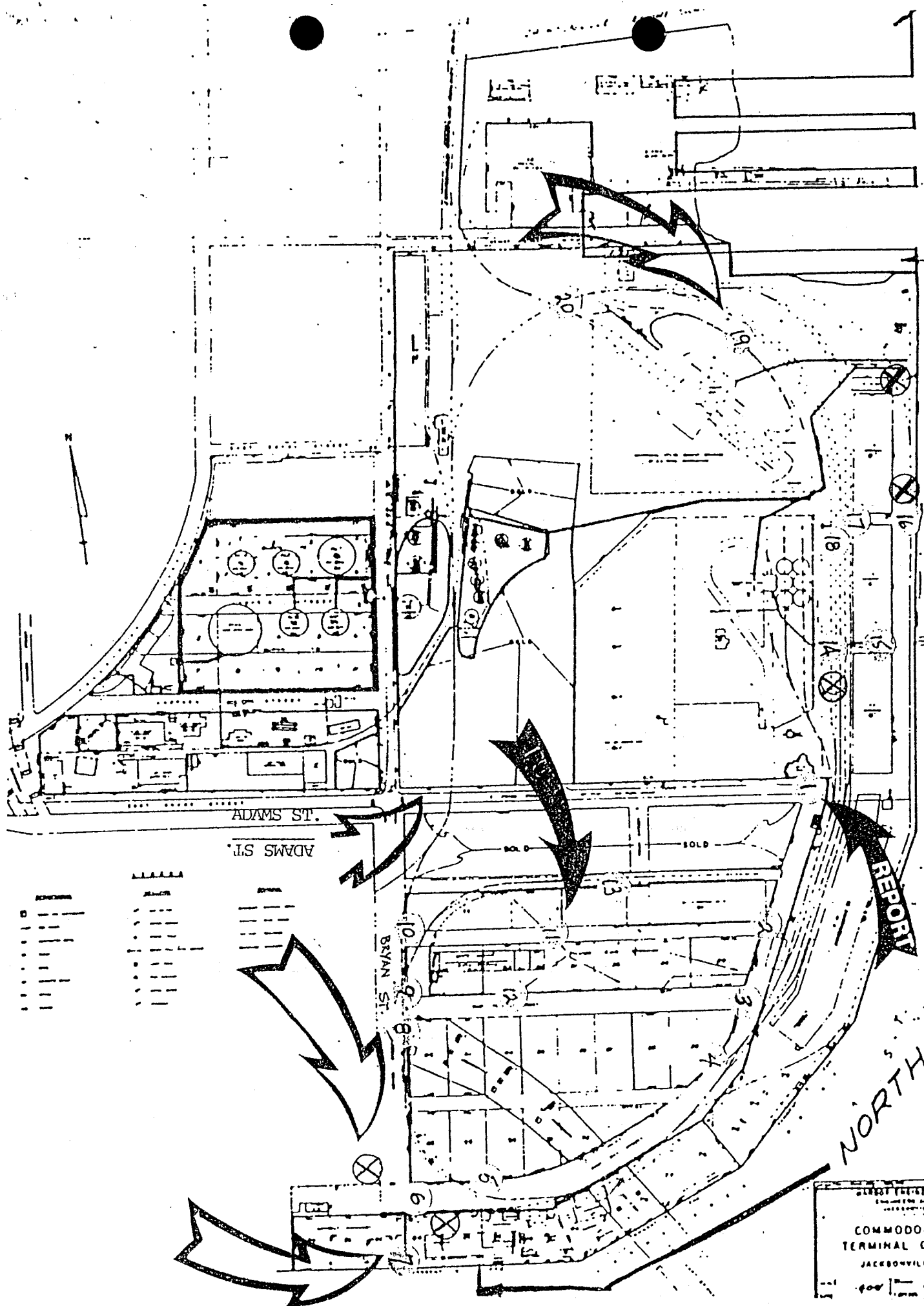
NORTH FLORIDA SHIPYARD  
HAZARDOUS WASTE CHARACTERIZATION

DATE: OCT 7, 1994.

COMMODORES POINT:

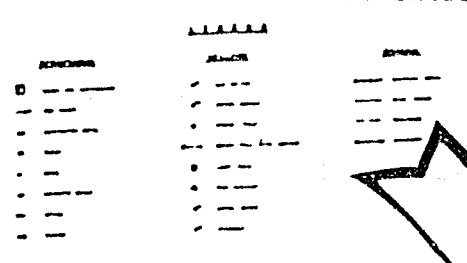
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PROPOSED  
NEW  
CONSTRUCTION



NORTH FLOOR

COMMODORE PARK  
TERMINAL CORPOR  
JACKSONVILLE, FLOR





# NORTH FLORIDA SHIPYARD, INC.

COMMODORES POINT - ADMINISTRATIVE OFFICE  
P. O. BOX 3255  
JACKSONVILLE, FLORIDA 32208



EMERGENCY GATES: 1, 7, 19

EMERGENCY GATES KEYS: Blue Circle, Lehigh, Apex, Mr. Hertle, & NFSY Secur

FIRE MAINS (Indicator)

Fire Main in Gate 1, 7, 19, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100

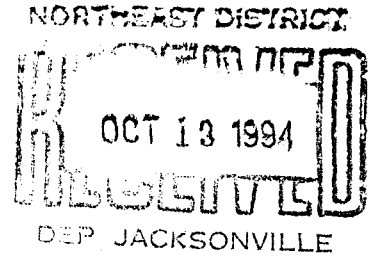
GATES BY NUMBER: )

WAREHOUSE B IS LOCATED ON THE RIVER IMMEDIATELY NORTH  
GATE 18, 17.

WAREHOUSE NEXT TO GATE #2.

WAREHOUSE NEXT TO GATE #10 AND #11

Northeast Florida Emergency Planning Committee  
9143 Phillips Highway, Ste. 350  
Jacksonville, Florida 32256



5 Oct 94

REF: EMERGENCY RESPONSE DATA

Dear Gentlemen:

Attached are the current site maps, hazardous waste stream characterization, and inspection log forms that will assist in the event of an emergency release at North Florida Shipyard / Commodores Point.

Any suggestions or recommendations concerning our preparedness for any contingency would be appreciated.

Cordially,

John B. Shiffert

jbs:wlb



Z 180 772 324

**Receipt for  
Certified Mail**

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

PS Form 3800, March 1993

Sent to NORTHEAST FLORIDA EMER. PLANNING COMMITTEE	
Street and No. 9143 PHILLIPS HWY	
P.O., State and ZIP Code JACKSONVILLE, FL 32256	
Postage	\$ 52
Certified Fee	1.00
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	1.00
TOTAL Postage & Fees	\$ 2.52
Postmark or Date	

JACKSONVILLE, FL  
OCT 13 1994



# NORTH FLORIDA SHIPYARD, INC.

COMMODORES POINT — ADMINISTRATIVE OFFICE  
P. O. BOX 3255  
JACKSONVILLE, FLORIDA 32206

Northeast Florida Emergency Planning Committee  
9143 Phillips Highway, Ste. 350  
Jacksonville, Florida 32256

5 Oct 94

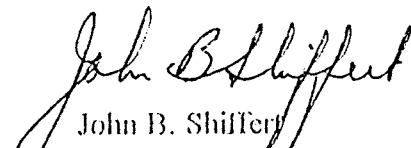
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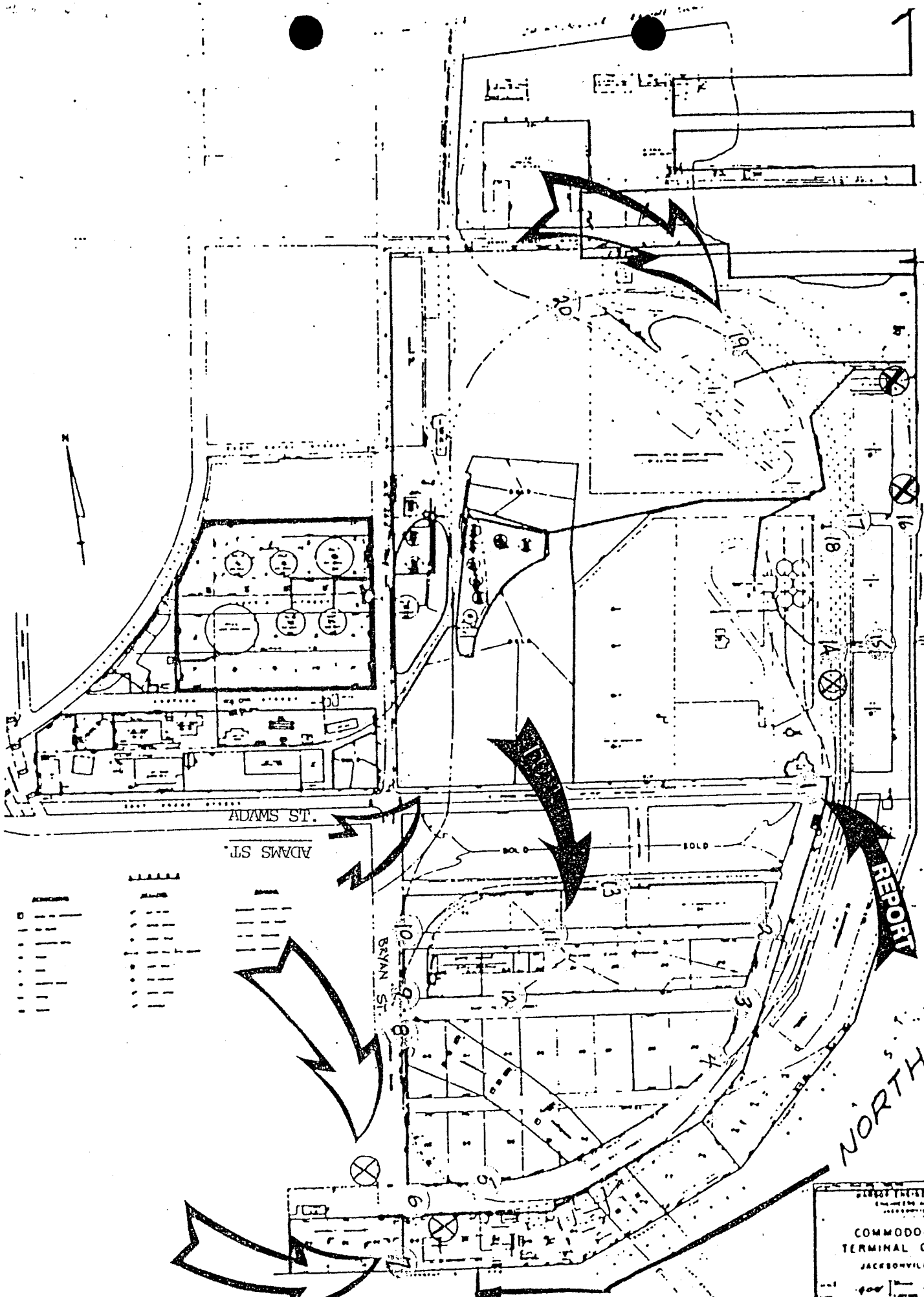


NORTH FLORIDA SHIPYARD  
HAZARDOUS WASTE CHARACTERIZATION

DATE: OCT 7, 1994.

COMMODORES POINT:

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PROPOSED  
NEW  
CONSTRUCTION

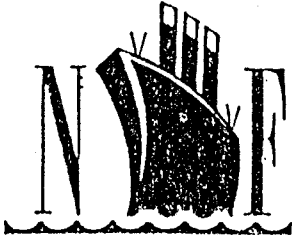
REPORT

NORTH FLOOR

ADAMS ST.  
ADAMS ST.

BRYAN ST.

COMMODORE PARK  
TERMINAL CORPORATION  
JACKSONVILLE, FLORIDA



# NORTH FLORIDA SHIPYARD, INC.

COMMODORES POINT — ADMINISTRATIVE OFFICE  
P. O. BOX 3255  
JACKSONVILLE, FLORIDA 32206



EMERGENCY GATES: 1, 7, 19

EMERGENCY GATES KEYS: Blue Circle, Lehigh, Apex, Mr. Hertle, & NFSY Security

FIRE MAINS (Indicator)

Fire Main at Gate 6,7 is freshwater and riverwater.

GATES BY NUMBER: )

WAREHOUSE D IS LOCATED ON THE RIVER IMMEDIATELY NORTH OF GATE 16/17.

POLLUTION STORAGE IS LOCATED NEXT TO THE TRANSPORTATION WAREHOUSE NEXT TO GATE #2.

FUEL STATION IS LOCATED BETWEEN GATE 13 and 11.

State Emergency Response Commission  
2740 Centerview Drive  
Tallahassee, FL 32399-2149

NORTHERN DISTRICT  
**RECEIVED**  
OCT 13 1994  
**RECEIVED**  
DEP JACKSONVILLE

5 Oct 94

REF: EMERGENCY RESPONSE DATA

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Cordially,

John B. Shiffert

jbs:wlb

2 180 772 322  
Receipt for  
Certified Mail  
No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

PS Form 3800, March 1993

Sent to	STATE EMERGENCY RESPONSE COMMISSION
Street and No.	2740 CENTERVIEW DRIVE
P.O., State and ZIP Code	TALLAHASSEE, FL 32399
Postage	
Certified Fee	\$ .52
Special Delivery Fee	1.00
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing Whom, Date, and Address	
TOTAL Postage & Fees	\$ 1.52
Postmark Date	OCT 13 1994

JACKSONVILLE, FL  
USPO



# NORTH FLORIDA SHIPYARD, INC.

COMMODORES POINT — ADMINISTRATIVE OFFICE  
P. O. BOX 3255  
JACKSONVILLE, FLORIDA 32206

State Emergency Response Commission  
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Tallahassee, Fl 32399-2149

5 Oct 94

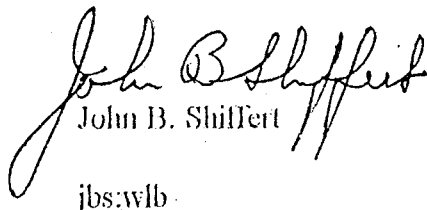
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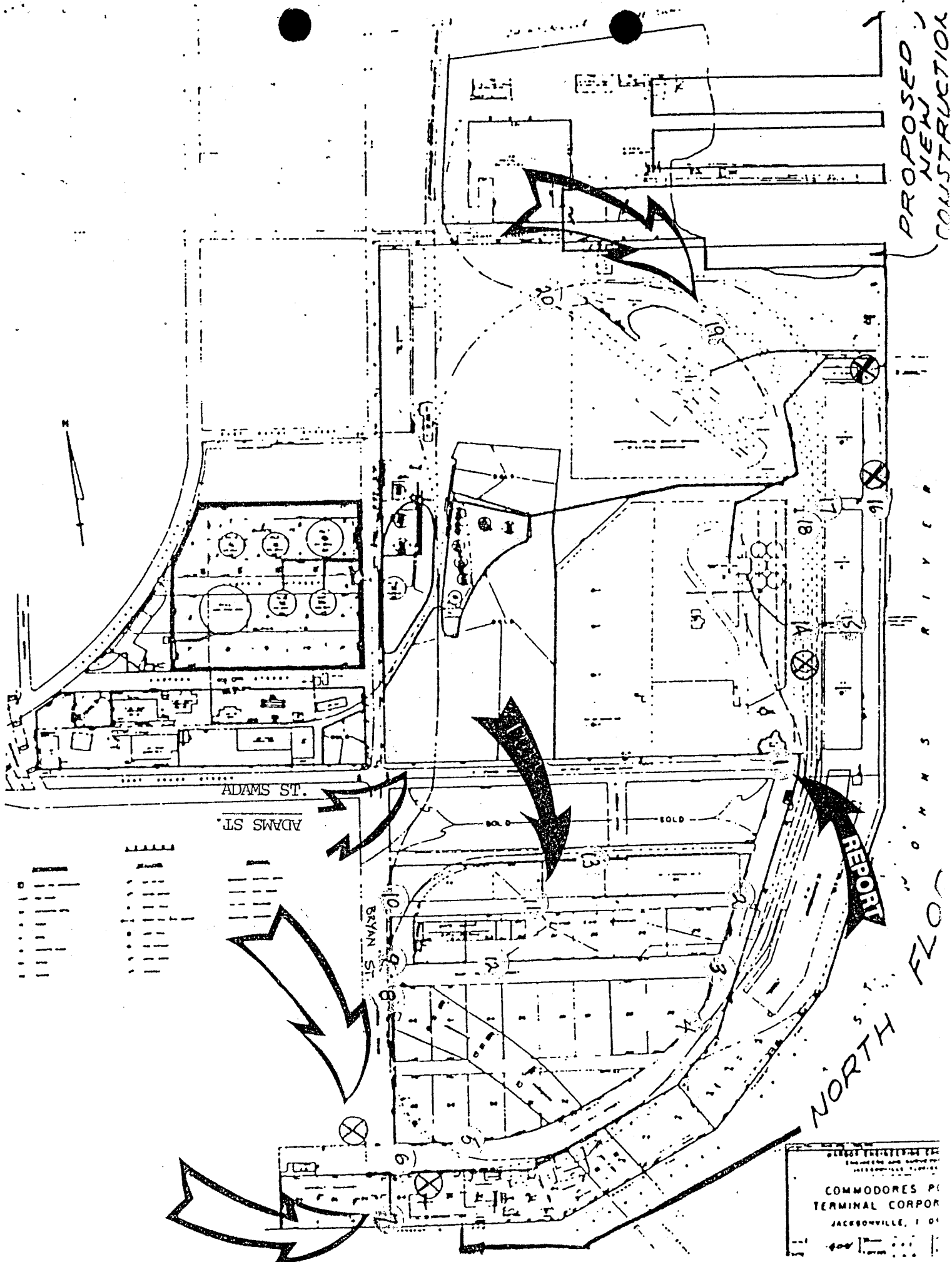
jbs:wlb

NORTH FLORIDA SHIPYARD  
HAZARDOUS WASTE CHARACTERIZATION

DATE: OCT 7, 1994.

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PROPOSED  
NEW  
CONSTRUCTION

ADAMS ST.

ADAMS ST.

BRYAN ST.

REPORT

NORTH FLOOR

COMMODORE PARK  
TERMINAL CORPORATION  
JACKSONVILLE, FLORIDA



# NORTH FLORIDA SHIPYARD, INC.

COMMODORES POINT — ADMINISTRATIVE OFFICE  
P. O. BOX 3255  
JACKSONVILLE, FLORIDA 32206

**REPORT**

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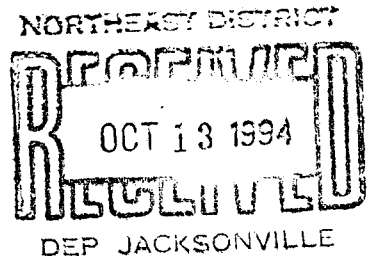
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City of Jacksonville  
Fire and Rescue Department  
Emergency Preparedness  
107 N. Market St.  
Jacksonville, FL 32216



5 Oct 94

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Cordially,

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jbs:wlb

PS Form 3800, March 1993

2 180 772 333  
Receipt for Certified Mail  
No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

Sent to CITY OF JACKSONVILLE	
FIRE & RESCUE DEPT	
Street and No. 107 N. MARKET STREET	
P.O., State and ZIP Code JACKSONVILLE, FL 32216	
Postage	\$ 52
Certified Fee	1.00
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom Date, and Address & Address	1.00
TOTAL Postage & Fees	\$ 2.52
Postmark Date	OCT 13 1994

JACKSONVILLE FL 32216



# NORTH FLORIDA SHIPYARD, INC.

COMMODORES POINT — ADMINISTRATIVE OFFICE  
P. O. BOX 3255  
JACKSONVILLE, FLORIDA 32206

City of Jacksonville  
Fire and Rescue Department  
Emergency Preparedness  
107 N. Market St.  
Jacksonville, Fl 32216

5 Oct 94

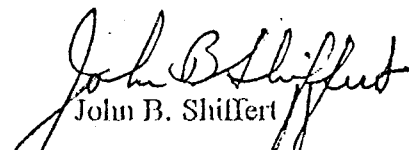
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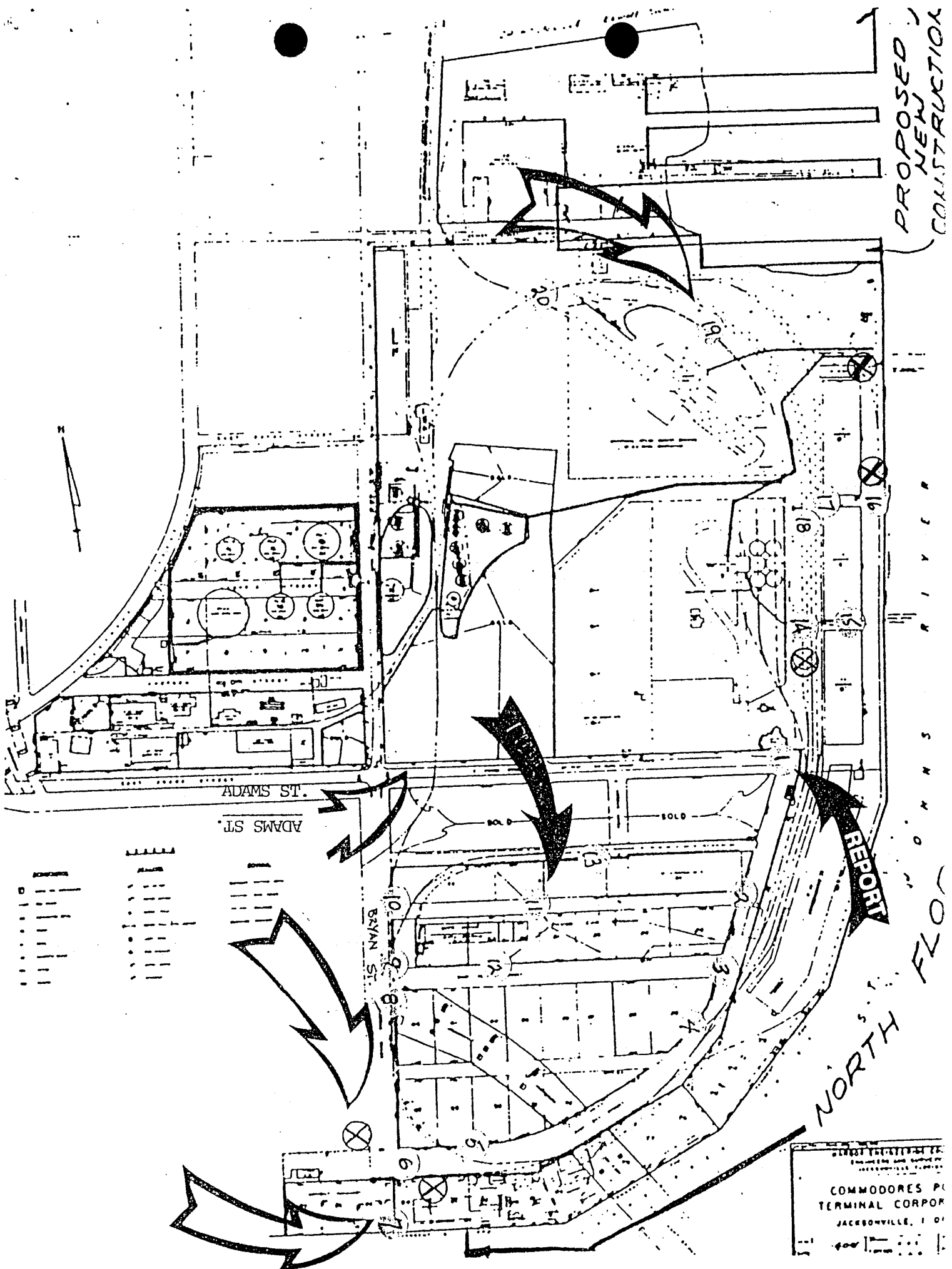
  
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NORTH FLORIDA SHIPYARD  
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PROPOSED NEW CONSTRUCTION

REPORT  
NORTH FLOOR

COMMODORES PORT  
TERMINAL CORPOR  
JACKSONVILLE, FLORIDA



# NORTH FLORIDA SHIPYARD, INC.

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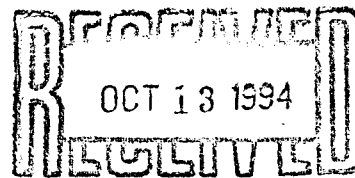
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Memorial Hospital  
3625 S. University Blvd.  
Jacksonville, FL 32216

NORTHEAST DISTRICT



DEP JACKSONVILLE

5 Oct 94

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Z 180 772 335

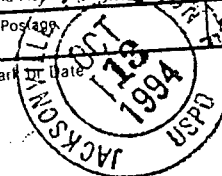


**Receipt for Certified Mail**

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

PS Form 3800, March 1993

Sent to <b>MEMORIAL HOSPITAL</b>	
<b>EMERGENCY PREPAREDNESS</b>	
Street and No <b>3625 S. UNIV. BLVD</b>	
P.O., State and ZIP Code <b>JACKSONVILLE, FL 32216</b>	
Postage	\$ <b>52</b>
Certified Fee	<b>1.00</b>
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Address	<b>1.00</b>
TOTAL Postage & Fees	<b>2.52</b>
Postmark Date	<b>OCT 13 1994</b>





# NORTH FLORIDA SHIPYARD, INC.

North Florida Hospital  
University Blvd.  
Jacksonville, Fl 32216

COMMODORES POINT — ADMINISTRATIVE OFFICE  
P. O. BOX 3255  
JACKSONVILLE, FLORIDA 32206

5 Oct 94

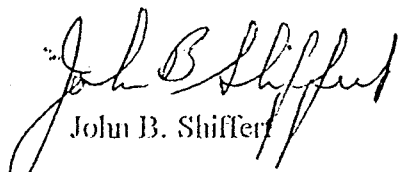
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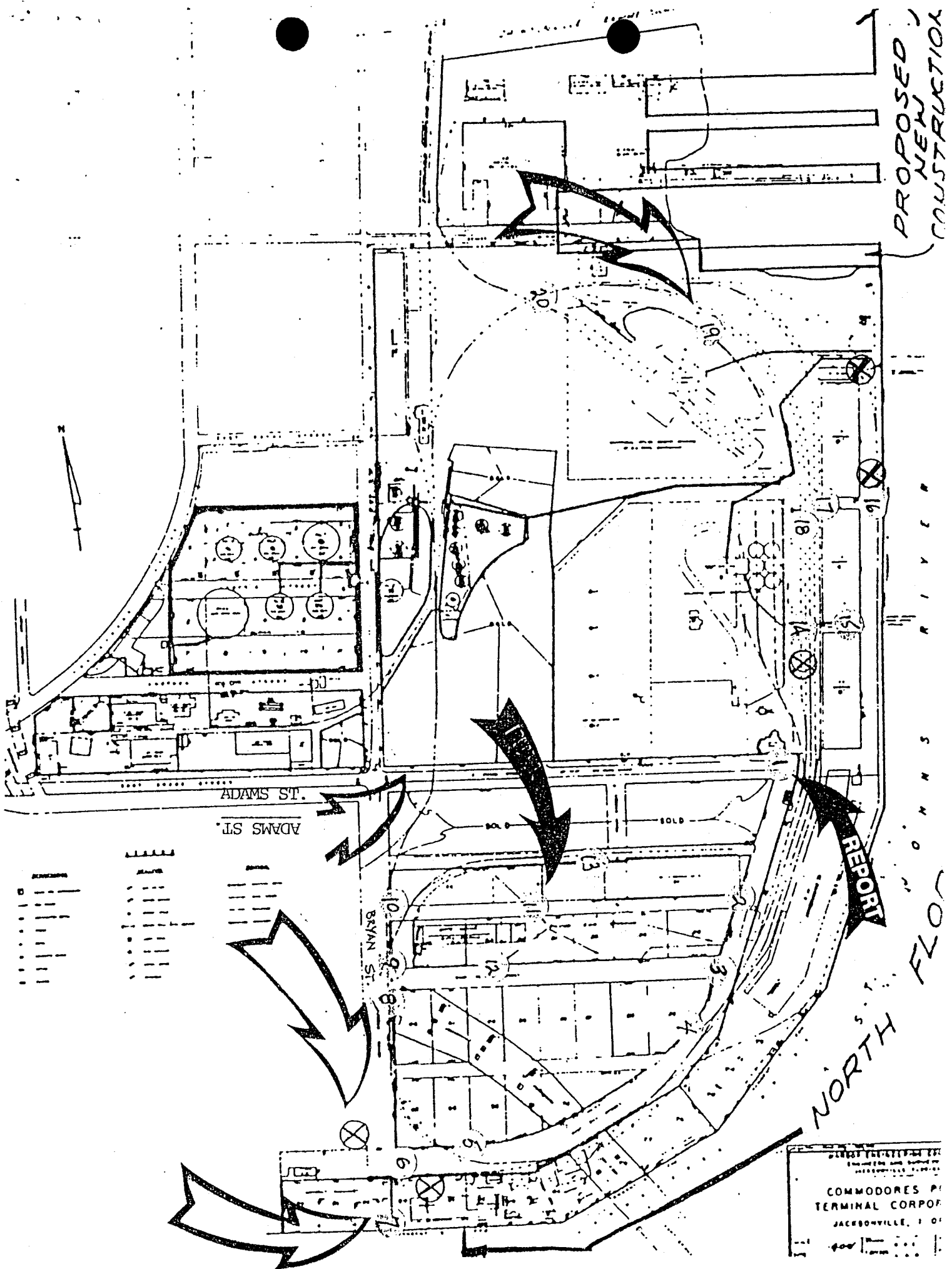
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PROPOSED  
NEW  
CONSTRUCTION

NORTH FLOR

COMMODORE PIER  
TERMINAL CORPOR  
JACKSONVILLE, FLOR

ADAMS ST.

ADAMS ST.

BRYAN ST.

REPORT



# NORTH FLORIDA SHIPYARD, INC.

COMMODORES POINT — ADMINISTRATIVE OFFICE  
P. O. BOX 3255  
JACKSONVILLE, FLORIDA 32206



EMERGENCY GATES: 1, 7, 19

EMERGENCY GATES KEYS: Blue Circle, Lehigh, Apex, Mr. Hertle, & NFSY Securi

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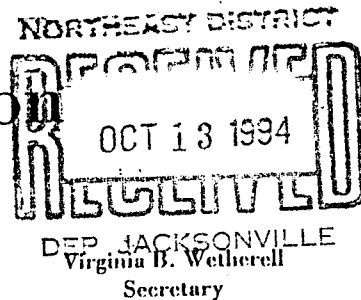
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Lawton Chiles  
Governor

Florida Department of  
**Environmental Protection**

Northeast District  
7825 Baymeadows Way, Suite B200  
Jacksonville, Florida 32256-7577



June 23, 1994

Mr. Wesley Bunce  
North Florida Shipyard, Inc.  
P. O. Box 3255  
Jacksonville, FL 32256

Dear Mr. Bunce:

North Florida Shipyard, Inc.  
Facility Inspection Log  
Duval County - Hazardous Waste

The Department has reviewed the information you submitted on June 9, 1994, in reference to a facility inspection log pursuant to 40 CFR 265.174, and finds it satisfactory.

If you have any questions regarding this letter, please contact me at the letterhead address or telephone (904) 448-4320, ext. 370.

Sincerely,

*Karen Davis Cates*  
Karen Davis Cates  
Environmental Specialist  
Hazardous Waste Section

*ve*  
KDC/kr



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

File

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

08-27-93

*John B.*  
JOHN SHIFFERT, CHIEF ENG  
NORTH FLORIDA SHIPYARD RIVER D  
650 E 27TH ST  
JACKSONVILLE FL 32206

The Hazardous Waste Management Program has reviewed your application for a hazardous waste DER/EPA I.D. Number.

Based on the information received you have been issued the following identification number for the facility at 5105 BUFFALO AVE (A), JACKSONVILLE

Facility ID # FLD984260919  
Your facility status is the following:

Small quantity generator.

Florida Administrative Code rule 17-730 requires all large quantity generators of hazardous waste and all hazardous waste treatment, storage, or disposal facilities to file a biennial report of their hazardous waste activities with DER. You must comply with this rule concerning the filing of a biennial report by March 1 for the preceding odd-numbered year. The report forms will be sent to the contact person. Businesses that generate less than 1000 kilograms of hazardous waste per month (small quantity generators) are not subject to these reporting requirements.

If any of the information on the Hazardous Waste activity form changes, please notify us in writing at the letterhead address. For further assistance, please call 904/488-0300.

Sincerely,

*Michael X. Redig*

Michael X. Redig  
Environmental Supervisor II  
Hazardous Waste Management Section

cc: Dave Gray - EPA/Region IV  
DER/Jacksonville  
GMS-ID # 3116P04876