Environmental Assessment

PROPOSED MOVING OF FLAMMABLE HAZARDOUS WASTE STORAGE TO A CENTRAL HAZARDOUS WASTE STORAGE AREA

U.S. Army Tank-automotive Armaments Command-
Armament Research, Development and Engineering Center
(TACOM-ARDEC)
Picatinny Arsenal, New Jersey 07806-5000

Proponent: _____ 23 February 2000
Paul E. Reed — Date
Environmental Engineer

Concur: _____ 23 FEB 2000
Timothy Miller — Date
Chief, Environmental and Natural Resources Team

Concur: _____ 24 FEB 00
Jonathan Van DeVenter — Date
U.S. Fish and Wildlife Service Coordinator

Concur: _____ 23 Feb 2000
Thomas J. Solecki — Date
Chief, Environmental Affairs Division

Concur: _____ 28 Feb 2000
Robert Souders — Date
Security Division

Concur: _____ 3/13/00
Francis A. Cassidy — Date
Chief, Legal Office

Approved by : _____ 20 Mar 2000
LTC Roger Behringer — Date
Garrison Commander

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FINDING OF NO SIGNIFICANT IMPACT

February 2000

Description of Proposed Action and Alternatives Considered

The Proposed Action, for which an environmental assessment has been prepared resulting in this Finding of No Significant Impact, is the moving of flammable hazardous waste from Building 1094 to a new (12 foot by 32 foot) Safety Storage storage locker. This storage locker will require a change to Hazardous Waste Facility Permit Number 1409E1HP05. In this proposed action, the Resource Conservation and Recovery Act (RCRA) closure of Building 1094 will be done. Also, the RCRA closure of Building 3114, Polychlorinated Biphenyls (PCBs) transformer storage building, will be done since the disposal of all PCBs will have been removed from the Arsenal.

Anticipated Environmental Effects

Since this is an internal storage action, the only exposure to the surrounding environment will be through accidental releases. The proposed change will reduced the distance the flammable hazardous waste must be transported to get off-site. Standard Operating Procedures (SOPs) and the spill plan are in place to minimized the environmental risks.

The proposed action is located in neither a wetland, nor within a floodplain area. Since there is minimal construction (i.e., a concrete base), wildlife will not be affected, since no trees or vegetation will be disturbed.

Facts and Conclusions Leading to the Finding of No Significant Impact

All elements of the Proposed Action have been evaluated in the Environmental Assessment in order to identify expected or potential environmental effects. No significant adverse environmental impacts have been identified, nor have conflicts with land use plans, policies, or controls have been observed. It is the conclusion of the Environmental Assessment that the Proposed Action will not have a significant impact on the

environment, and therefore will not be the subject of an Environmental Impact Statement. As a result, the Finding of No Significant Impact (FNSI) has been prepared.

Public Comment Period

The deadline for the general public to comment on this project or to submit requests for further information is 30 days from the date of public notification of this FNSI. The U.S. Army point of contact is Mr. Peter Rowland, Public Affairs Officer, U.S. Army TACOM-ARDEC, Attn: AMSTA-AR-IN, Picatinny Arsenal, NJ 07806-5000, (973)724-6364.

NOTICE OF AVAILABILITY

The U.S. Army Armament Research, Development and Engineering Center, Picatinny Arsenal, New Jersey has prepared an environmental assessment (EA) for the moving of flammable hazardous waste storage to a central hazardous waste storage area. Building 1094 currently stores flammable hazardous waste. This action is to move the hazardous waste to Building 3100 by purchasing a 12 foot by 32 foot Safety Storage storage locker. This storage locker will require a change to Hazardous Waste Facility Permit Number 1409E1HP05. In this proposed action, the hazardous waste closure of Building 1094 will be done. Also, the hazardous waste closure of Building 3114, Polychlorinated Biphenyls (PCBs) transformer storage building, will be done since the disposal of all PCBs will have been removed from the Arsenal.

The EA has resulted in a finding of no significant impact (FSNI) based on the conclusion that these activities pose no significant threat to the environment at Picatinny Arsenal.

Copies of the EA and the FONSI may be reviewed at the Science and Technical Information Library, Building 59, and Public Affairs Office, Building 1, Picatinny Arsenal.

The deadline for submission of written comments is 30 days after publication of this notice. Written comments should be sent to: Commander, U.S. Army Armament Research, Development and Engineering Center, ATTN: AMSTA-AR-PSE, Mr. Paul E. Reed, Picatinny Arsenal, NJ 07806-5000.

For further information, please contact the Picatinny Arsenal Public Affairs Office at (973)724-6364.

ENVIRONMENTAL ASSESSMENT

For the

PROPOSED MOVING OF FLAMMABLE HAZARDOUS WASTE STORAGE TO A CENTRAL HAZARDOUS WASTE STORAGE AREA

By

Paul E. Reed
Environmental Engineer
U.S. Army TACOM-ARDEC
Attention: AMSTA-AR-PSE, Building 319
Picatinny Arsenal, NJ 07806-5000

February 2000

Abstract: Building 1094 currently stores flammable hazardous waste (i.e., DOT Classes 3 and 4). This proposal action is to move it to Building 3100 by purchasing a 12 foot by 32 foot Safety Storage storage locker. This storage locker will require a change to Hazardous Waste Facility Permit Number 1409E1HP05. In this proposed action, the hazardous waste closure of Building 1094 will be done. Also, the hazardous waste closure of Building 3114, Polychlorinated Biphenyls (PCBs) transformer storage building, will be done since the disposal of all PCBs will have been removed from the Arsenal.

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1.0 Purpose of and Need for a Centralized Hazardous Waste Storage Area.

1.1 The Environmental Affairs Division at Picatinny Arsenal proposes to move the flammable storage area (Building 1094) to where all other hazardous waste is kept (Building 3100). This proposal includes the purchase of a Safety Storage, Inc.'s storage locker. This action will require a Class 2 modification of Picatinny Arsenal's Hazardous Waste Storage Permit Numbered 1409E1HP05. The expected start of usage of this storage locker is April-May 2000.

1.2 Since Building 1094 is not located at the truck loading area, the contractor must carry this flammable hazardous waste from Building 1094 to Building 3100 for each load that contains flammable liquids, flammable aerosols, etc. A few times this past year, the transporter failed to make it to Picatinny Arsenal and the flammable hazardous waste had to be moved back to Building 1094. The proposed storage locker at Building 3100 will eliminate the need for this movement of approximately 1800 feet of traveling.

1.3 Objectives of the Proposed Action.

This is to make Building 3100 and this proposed storage locker the centralized hazardous waste storage area for Picatinny Arsenal. This proposed action will eliminate the need for moving waste prior to shipment. The proposed Safety Storage's storage locker comes with spill containment, fire extinguishing system and alarm, 96 square feet of shelving, electric heater, and storage for 30-55 gallon drums.

1.4 Scope of this Environmental Analysis.

1.4.1 History of Picatinny Arsenal's RCRA Storage Permit

Date	Event
March 1991	New Jersey Department of Environmental Protection (NJDEP) issues Hazardous Waste Storage Facility Permit No. 1409E1HP01 for hazardous waste storage at 3 storage buildings and 2 tanks.
March 1996	NJDEP issues Permit No. 1409E1HP04 as a permit renewal.

Date	Event
May 1997	NJDEP revises their regulations and revokes Permit Number 1409E1HP04 and reissues Permit Number 1409E1HP05. With this new permit, the 2 tanks were removed.
June 1998	Mr. Fred Sanchez orders from Safety Storage, Inc. a 12 foot by 32 foot storage locker. This was ordered at the same time as the six smaller lockers for the Hazmart, Building 316.
April 1999	Public Works Directorate places a concrete slab at Building 3100.
May 1999	The storage locker arrives at Picatinny Arsenal and is unload by Mr. Dale Stanton's group.
September-November 1999	O'Brien & Gere Engineers, Inc. prepared the site map for the permit modification.
February 2000	Permit revision is to be requested.

1.4.2 Related Other Relevant Documents.

Letter, from Mr. Thomas J. Solecki to Mr. Thomas Sherman, New Jersey Department of Environmental Protection, entitled "Hazardous Waste Facility (HWF) Permit Number 1409E1HP05 Modification, U.S. Army Armament Research, Development and Engineering Center, Morris County, New Jersey, EPA ID No. NJ3210020704, Requesting a Class 2 Modification of Building 3100, and Closures of Buildings 1094 (Flammables) and 3114 (Polychlorinated biphenyls (PCB) Transformers, etc.)", dated February 7, 2000.

1.4.3 Issues Studied in Detail

None.

1.4.4 Issues Eliminated From Detailed Study

None.

1.5 Decision That Must Be Made.

The Commander must sign a revision to Hazardous Waste Permit Application, Part A, and the Chief, Environmental Affairs Division, will sign the letter requesting a Class 2 Modification to the storage facilities.

1.6 Applicable Regulatory Requirements and Required Coordination.

(a) Title 40, Code of Federal Regulations, Parts 260, 261, 262, 263, 264, 266, 268, and 270.

(b) New Jersey Administrative Code, Title 7, Chapter 26G, Hazardous Waste Regulations.

(c) Hazardous Waste Facility Permit, Facility Permit Number 1409E1HP05, Effective Date: May 28, 1997, Expiration Date: March 12, 2006.

(d) New Jersey Administrative Code, Title 7, Chapter 1E, Discharges of Petroleum and Other Hazardous Substances.

(e) New Jersey Administrative Code, Title 7, Chapter 14A, Pollutant Discharge Elimination System (as to Storm Water).

(f) Combined Plan, Emergency Response Action Plan and Facility Response Plan, Spill Prevention Control and Countermeasure Plan, Discharge Prevention Control and Countermeasure Plan, Discharge Cleanup and Removal Plan, Picatinny Arsenal, New Jersey, Dated May, 1999.

(g) Permit Modification must be sent to Mr. Thomas Sherman at New Jersey Department of Environmental Protection.

2.0 Description of Alternatives

2.1 Detailed Description of Alternatives.

2.1.1 No Action Alternative - Leave Flammable Hazardous Waste Storage at Building 1094.

This requires the movement of flammable hazardous waste from Building 1094 to Building 3100 for loading of transport vehicles to off-site locations.

2.1.2 An Action Alternative - Purchase and Permit an Hazardous Waste storage locker at Building 3100.

This allows the transport vehicle to be loaded at Building 3100 without being moved from another building.

2.1.3 Another Action Alternative - Move Flammable Hazardous Waste storage to Building 3114.

Building 3114 is a large unheated storage building. The building is too large just for the storage of flammable hazardous waste. Also, this building would increase the distance that the pickup would have to travel to Building 3100.

2.2 Comparison Summary Matrices of Predicted Environmental Effects of All Alternatives.

Alternatives	Distance of Travel
No Action Alternative - Keep at Bldg. 1094	1800 feet
Action Alternative - All at Bldg. 3100	0 feet
Another Action Alternative - Move to Bldg. 3114	3600+ feet

2.3 Identification of the Preferred Alternative.

Purchasing and Permit Modification to allow a new Storage Locker at Building 3100 for Flammable Hazardous Waste.

3.0 Affected Environment.

This section discusses the relevant resource components of the existing environment. Since this is an internal storage action, the only exposure to the surrounding environment will be through accidental releases. Standard Operating Procedures (SOPs) and spill plan (the Combined Plan, Emergency Response Action Plan and Facility Response Plan, Spill Prevention Control and Countermeasure Plan, Discharge Prevention Control and Countermeasure Plan, Discharge Cleanup and Removal Plan, Picatinny Arsenal, New Jersey, Dated May, 1999) are in place to minimize the environmental risks.

4.0 Environnemental Consequences.

Normal hazardous waste operations are conducted according to SOPs that will preclude negative environmental impacts. Transport and transfer of hazardous waste will be controlled through Standard Operating Procedures (SOPs), record keeping in compliance with Title 40, Parts 260, 261, 262, 263, 264, 266, 268 and 270 and Picatinny Arsenal's Hazardous Waste Management Plan.

Accidental spill will be handled in compliance with the spill response and reporting mentioned in the Combined Plan, Emergency Response Action Plan and Facility Response Plan, Spill Prevention Control and Countermeasure Plan, Discharge Prevention Control and Countermeasure Plan, Discharge Cleanup and Removal Plan, Picatinny Arsenal, New Jersey, Dated May, 1999.

Storm Water Management Plans are in place for Buildings 3100, 1094 and 3114.

4.1 No Action Alternative - Leave Flammable Hazardous Waste Storage at Building 1094.

Building 1094 requires the movement of flammable Hazardous waste from the front of the building to the rear for storage. The rear storage area is not heated. This building has pealing lead paint, broken water pipes, and steam heater. It also requires a pickup vehicle to move the flammable hazardous waste to Building 3100 for off-site transportation.

4.2 An Action Alternative - Purchase and Permit an Hazardous Waste Storage Locker at Building 3100.

Moving the flammable hazardous waste to Building 3100 location will eliminate the need for a pickup to move this waste from Building 1094. This new storage locker has spill containment and fire protection built in.

4.3 Another Action Alternative - Move Flammable Hazardous Waste Storage to Building 3114.

Building 3114 has no heat and is too large of a building just for storing flammable hazardous waste. It would also increase the distance for transport and therefore increasing potential spills.

5.0 List of Preparers.

Paul E. Reed, Environmental Engineer

6.0 List of Persons Consulted and/or Provided Copies.

No impact to Natural Resources.

Jonathan Van DeVenter, Natural Resource Manager, U.S. Fish and Wildlife Service Co-ordinator.

No impact to Cultural Resources.

Timonthy L. Miller, Cultural Resources Manager

DEPARTMENT OF THE ARMY
UNITED STATES ARMY TANK - AUTOMOTIVE AND ARMAMENTS COMMAND
ARMAMENT RESEARCH, DEVELOPMENT AND ENGINEERING CENTER
PICATINNY ARSENAL, NEW JERSEY 07806-5000

February 22, 2000

Environmental Affairs Division

SUBJECT: Hazardous Waste Facility (HWF) Permit Number 1409E1HP05 Modification, U.S. Army Armament Research, Development and Engineering Center, Morris County, New Jersey, EPA ID No. NJ3210020704, Requesting a Class 2 Modification of Building 3100, and Closures of Buildings 1094 (Flammables) and 3114 (Polychlorinated biphenyls (PCB) Transformers, etc.)

Mr. Thomas Sherman, Chief
New Jersey Department of Environmental Protection
Division of Solid and Hazardous Waste
Bureau of Hazardous Waste and Transfer Facilities
401 East State Street
P.O. Box 421
Trenton, New Jersey 08625-0421

Dear Mr. Sherman:

Picatinny Arsenal would like to do a Class 2 Modification to the storage buildings under the storage permit. Building 3100 will have an additional storage locker placed at this building location. This is a Class 2 Modification per Title 40 Code of Federal Regulations Part 270, Appendix I to 40 CFR 270.42(F:)(2)(a.). Attached is a Check No. 5570-92,079,652 for $5,168.00 per N.J.A.C. Title 7, Chapter 26G, Section 3.3(e)7.ii. (Class 2 modifications).

This modification will allow for a centralized hazardous waste center at Picatinny Arsenal. After the new storage locker is installed with electricity, an eye wash, fire extinguisher system activation, and a fire alarm hookup with the Picatinny's Fire and Emergency Services Division, the closure of Building 1094 will proceed. This is expected to be done this spring. The closure of Building 3114 will also be done since all Polychlorinated Biphenyl and Polychlorinated Biphenyl Contaminated transformers have been removed from Picatinny Arsenal and there will be no need for this building as a Hazardous Waste Facility.

Printed on Recycled Paper

Please find attached a new "Hazardous Waste Permit Application, Part A". This Part A is for container storage at Building 3100, Subpart X Activity of Open Detonation, Subpart O Activity for the Explosive Waste Incinerator and Subpart X Activity for Open Burning. The Open Burning is expected to close after the Explosive Waste Incinerator and Hot Air Decontamination Facility are operational. This is expected during CY2001. It also includes the new "U" and "P" hazardous waste codes that are listed in Title 40, Code of Federal Regulations, Part 261, Section 261.33.

Also attached are new engineering drawings. These will replace the drawings listed in Item No. 6 on Page 17 of the permit:

(a) Modifications to Building 3100 for Hazardous Waste Facility Permit, signed and sealed by Steven J. Roland, P.E., dated November 4, 1999.

(b) Safety Storage drawings for Model 32FS, Serial Number 11043, signed and sealed by Ned C. Meyers, P.E., dated December 10, 1998. This includes the following drawing numbers: DA1393-1A (Elevations), STD-FS1A (Structural Drawing) and STD-FS2A (Structural Details).

The following drawings are included (without Professional Engineering's seal): DA1393-CA (Cover Sheet), DA1393S1A (Wiring Diagram) and DA1393-3A (Sprinkler). The Structural Calculations for Model 32FS, No. 11043 are signed and sealed by Ned C. Meyer, P.E., dated December 10, 1998.

The closure of Building 1094 will follow the Closure Plan that is dated November 1988. A clean closure of the tank at this building will be done, since there have been no spills into this tank. This closure will be started in the April-May 2000 timeframe.

The closure of Building 3114 will follow the changes to the Closure Plan of November 1988, that were approved by you on April 21, 1998. This closure will be started also in the April-May 2000 timeframe.

The following minor modications should also be done to the permit:

Page 12 - Area Code (201) should be changed to (973) in five places.

Page 13 - Area Code (201) should be changed to (973) in four places.

Page 19 - Please add a note to the column named "Maximum Container Volume (Gallons)." Any container holding volatile organics at a concentration greater than 500 parts per million by weight must be less than 121 gallons (0.46 cubic meters). This is needed to be in compliance with Subpart CC permit that Region II, Environmental Protection Agency, is preparing.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any other questions, please contact Mr. Paul Reed at (973) 724-5302.

Sincerely,

Thomas J. Solecki
Chief, Environmental Affairs
Division

Enclosure

Copies Furnished:

Mr. Raymond Basso, EPA Region II (w/o drawings)