HAZARDOUS WASTE MANAGEMENT
PERMIT FACT SHEET

DRAFT HAZARDOUS WASTE MANAGEMENT POST-CLOSURE CARE AND SITE-WIDE CORRECTIVE ACTION PERMIT

February 25, 2019

Facility Name: Huntington Ingalls, Inc., Newport News Shipbuilding
EPA ID Number: VAD001307495
Address: 4101 Washington Avenue
Newport News, Virginia 23607
Owner/Operator: Huntington Ingalls, Inc.
4101 Washington Avenue
Newport News, Virginia 23607
Type of Permit: Hazardous Waste Management Post-Closure Care and Site-Wide Corrective Action Permit

Purpose of Fact Sheet

This fact sheet is prepared in accordance with the requirements of the Virginia Hazardous Waste Management Regulations (VHWMR), 9 VAC 20-60-124, as incorporated by reference under 40 CFR § 124.8. This fact sheet provides information on the status of the facility, the facility background, the facility's current post-closure care and corrective action activities, and the public comment period associated with the draft Hazardous Waste Management Post-Closure Care and Site-Wide Corrective Action Permit.

Introduction - Facility Background

The Huntington Ingalls Inc., Newport News Shipbuilding Facility located on the southwest edge of the city of Newport News, Virginia consists of approximately two (2) square miles and is bounded on the north and west by the James River; on the east by Washington, Huntington, and West Avenues; and on the south by 31st Street.

The Facility was constructed on dredged material with elevations ranging from 10 to 35 feet above mean sea level. The higher elevation is on the eastern side where fill material meets the natural riverbank. The facility has been operating the shipbuilding production that includes the construction and repair of military and commercial ships since 1888.

The shipbuilding production process generated hazardous waste that included characteristic hazardous waste for corrosivity (D002), Cadmium (D006), Chromium (D007), and Lead (D008). These wastes were disposed of in the former surface impoundments (SWMU 12a, or the Regulated Unit) that are located in the north central portion of the Facility and are currently under Post-Closure Care. The impoundments were designed to neutralize basic and acidic wastes, precipitate metals hydroxides, and provide retention time for gravity separation of oily wastes. The disposal of hazardous wastes into these impoundments was discontinued in December 1982. The regulated units were used for the disposal of oily wastes until 1985. The oily wastes originated primarily from bilges, machine shops, lubricating systems, and hydraulic systems, were classified by the Permittee as non-hazardous.
The impoundments were closed in 1985 by excavating and removing residual waste material and soil in accordance with a Department-approved closure plan. The surface impoundments were backfilled and covered by the 117,658 square foot Blast and Coat Building (Building 4730). The units were certified closed on November 8, 1985.

In July 1981, the Permittee implemented an interim status groundwater monitoring program, which was designed to evaluate groundwater quality in the uppermost aquifer beneath the two operating surface impoundments. The wells were abandoned in 1985 prior to construction of the Blast and Coat Building.

In 1992, the Facility reinstated a groundwater monitoring program in response to the HSWA Amendments requiring facilities that closed land-based units without groundwater monitoring to demonstrate that they met the closure performance standards for groundwater. On October 27, 1993, the DEQ required the Facility to implement a Groundwater Quality Assessment Program.

The Department determined that the two (2) (collectively referred to as Solid Waste Management Unit (SWMU) 12a) surface impoundments had impacted the groundwater quality down-gradient of the units. In accordance with the approved Groundwater Quality Assessment Program, (GQAP, March 1994), three additional monitoring wells were installed on March 9, 1995 to define the extent of contamination. The November 1996 and April 1997 groundwater data indicated that corrective action was required at the point of compliance (POC) to address groundwater contamination that exceeded the groundwater protection standards (GPS) related to the former surface impoundments. Groundwater monitoring for SWMU 12a will be conducted under the Groundwater Corrective Action groundwater monitoring program as required by 40 CFR § 264.100 which is described in the Groundwater Corrective Action - SWMU 12a, Module (Permit Module VI).

On September 24, 1998, the Department issued a Hazardous Waste Management Permit for Post-Closure Care and Corrective Action for the two (2) former hazardous waste surface impoundments (SWMU 12a). Subsequent to the issuance of this Post-Closure Permit, DEQ received delegated authority from EPA for Site-Wide Corrective Action for permitted facilities on September 29, 2000. On July 13, 2001, Department issued the permit for Corrective Action.

On September 6, 2011, Department approved the Class 2 Permit Modification request to consolidate the Corrective Action Permit and the Post-Closure Care Permit into one Permit to have a common expiration date and the permit is designated as the Hazardous Waste Management Permit for Post-Closure Care and Site-Wide Corrective Action.

Post-closure care including groundwater monitoring and related corrective action for two (2) closed surface impoundments (SWMU 12a), are in accordance with Permit Module III, VI and Permit Attachment C (Post-Closure Care Plan). Site-Wide Corrective Action for investigation, monitoring, interim measures, and/or corrective actions related to other SWMUs as specified in this Permit will be in accordance with Permit Module VII.

Post-Closure Care Activities

Post-closure care requirements for the regulated units are implemented for a period of thirty (30) years after final closure certification. The units were certified closed on November 8, 1985. The Post-closure care were extend beyond November 8, 2015 in accordance with Permit Condition(s) III.C.1 and III.H.1. All post-closure care activities must be conducted in accordance with the provisions of the Post-Closure Care Plan (Permit Attachment C).
Corrective Action Program Activities

Requirements to remediate groundwater, also known as corrective measures, are necessary to protect human health and the environment given current and reasonably anticipated future land use. The corrective action remedy decision requires the Facility to continue the post-closure care and groundwater monitoring program for SWMU 12a, continue groundwater monitoring to monitor natural attenuation for hazardous constituents, and maintain certain property mechanisms known as Institutional Controls (ICs) and Engineering Controls (ECs). The remedy will be implemented through the Facility’s RCRA Permit.

Under this remedy, the following actions are required:

1. Continue post-closure care and the groundwater monitoring program at SWMU 12a to monitor natural attenuation of hazardous constituents (Permit Attachment F, Table F-1);
2. Continue groundwater monitoring programs at SWMU 25 and ORF2 (Oil Reclamation Facility 2) to monitor natural attenuation of hazardous constituents (Permit Attachment F, Table F-2);
3. Continue to monitor and measure mineral oil thickness at SWMU 38 and conduct passive recovery as needed;
4. Since the metal sorting area serves as an engineering control currently mitigating exposure to contaminants in soil at SWMU 10, complete the proposed surface soil removal when the area is no longer used or install an alternative engineering control that achieves the same purpose in the event the sorting area is removed; and
5. Impose and maintain compliance with land use restrictions including institutional controls (IC) and engineering controls (ECs) consisting of property use restrictions for groundwater and soil in accordance with the Permit. The Institutional and Engineering controls include the following:
   i. The property shall not be used for residential purposes or for children’s (under the age of 16) daycare facilities, schools, or playground purposes and senior care facilities;
   ii. Groundwater beneath the property shall not be used for any purpose except for environmental monitoring and testing, or for non-contact industrial use as may be approved by DEQ. DEQ must approve any new groundwater wells installed at the facility area;
   iii. Maintain and prohibit disturbance of the engineered cover over SWMU 12a;
   iv. Excavation and disturbance within areas known to have contaminants left in place on the property shall be conducted in accordance with the Facility’s excavation permitting process as detailed in the CMI Plan required by the Permit;
   v. Maintain the existing security fencing along the perimeter of the property; and
   vi. Future modifications at the property that could be reasonably understood to adversely affect or interfere with the integrity or protectiveness of the final remedy will be evaluated by the Facility in coordination with DEQ to identify and address those potential impacts or interferences.

Purpose of the Permitting Process

One of the purposes of the permitting process is to give DEQ, interested citizens, and other governmental agencies the opportunity to evaluate the proposed draft permit and the ability of the Permittee to comply with the applicable hazardous waste management requirements of the Permit
and the VHWMR. The draft permit sets forth in one document all the requirements which the Permittee must comply with during the ten (10) year duration of the permit. These requirements include, but are not limited to, the regulations as set forth in the VHWMR.

**Draft Permit**

The draft permit is based on the permit application submitted on June 5, 2018. DEQ has reviewed the permit application, and has found the Part A and B permit application submittals to be technically adequate and complete to comply with the requirements of the VHWMR.

Therefore, pursuant to the VHWMR, under 9 VAC 20-60-124, and as adopted by reference, 40 CFR § 124.6, DEQ has prepared a draft permit for renewal.

The draft permit is divided into seven (7) parts, Modules I through VII and a list of Permit Attachments that are incorporated into the permit. The seven (7) parts of the permit are outlined below. The column entitled “Regulation”, identifies the regulatory authority for the permit conditions in Modules I through VII of the Permit. The VHWMR, 9 VAC 20-60, has incorporated by reference, the federal regulations under the Resource Conservation and Recovery Act (RCRA). Applicable citations of the RCRA regulations are provided below.

**Table 1 - Permit Organization**

<table>
<thead>
<tr>
<th>Module</th>
<th>Title</th>
<th>Regulation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Module I</td>
<td>Standard Conditions</td>
<td>40 CFR § 270.30 and 40 CFR § 270.32</td>
<td>Contains conditions, which generally apply to all hazardous waste management facilities</td>
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<tr>
<td>Module II</td>
<td>General Facility Conditions</td>
<td>40 CFR § 270.14</td>
<td>Contains conditions, which generally apply to all hazardous waste management facilities</td>
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<td>Module III</td>
<td>Post-Closure Care – SWMU 12a</td>
<td>40 CFR Part 264, and 40 CFR § 270.28</td>
<td>Contains conditions, which apply to the operation and maintenance for the hazardous waste management units during the post-closure period</td>
</tr>
<tr>
<td>Module IV</td>
<td>Detection Monitoring</td>
<td>40 CFR § 264.98</td>
<td>Contains conditions, which apply to groundwater detection monitoring for the hazardous waste management units during the permit period.</td>
</tr>
<tr>
<td>Module V</td>
<td>Groundwater Compliance Monitoring</td>
<td>40 CFR § 264.99</td>
<td>Contains conditions which apply to groundwater monitoring for the hazardous waste management units during the permit period</td>
</tr>
<tr>
<td>Module VI</td>
<td>Groundwater Corrective Action – SWMU 12a</td>
<td>40 CFR § 264.100</td>
<td>Contains conditions, which apply to groundwater monitoring for the hazardous waste management units during the permit period.</td>
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**List of Permit Attachments**

The List of Permit Attachments provides detailed information associated with the Facility's post-closure care and corrective action activities including waste characteristics as to assure that sufficient information is available and that appropriate procedures are in place for the proper handling and treatment of wastes at the facility so to avoid or minimize hazards to human health and the environment.
DEQ and EPA Region III have evaluated the need for investigations and/or cleanup of past releases at Huntington Ingalls, Inc., Newport News Shipbuilding (facility) in Newport News, VA. This evaluation is a routine part of all permits issued since 1984 in compliance with 40 CFR § 264.101. Upon approval of the Draft Permit, the attachments will be considered enforceable Conditions of this Permit. The following Permit Attachments are incorporated into the proposed draft permit by reference.

**Attachment A** Facility Maps and Figures  
**Attachment B** Facility Background, Corrective Action, and Environmental History  
**Attachment C** Post-Closure Care Plan: Closed Surface Impoundment – SWMU 12a  
**Attachment D** Personnel Training  
**Attachment E** Groundwater Monitoring Program, Sampling and Analysis Plan  
**Attachment F** Groundwater Monitoring Constituents and Corrective Action Remedial Targets

**Financial Assurance**

Financial assurance is required to assure the facility has adequate funding to implement the approved post-closure care plan and the corrective action remedy(s) at the facility. The financial assurance is based upon the post-closure care plan and the corrective action cost estimate procedures identified in Module VII of the draft permit. The cost estimate for completing the approved remedy(s) shall be updated pursuant to the development of more detailed information (e.g., Corrective Measure Implementation) and any modifications to the approved remedy(s)). Within thirty (30) calendar days of approval of any revised cost estimate, the Permittee shall demonstrate to DEQ financial assurance for the updated cost estimates.

**Public Notice of Proposed Permit Actions**

The purpose of public notice of a proposed permit action is to provide DEQ, interested citizens, other governmental agencies, etc., the opportunity to evaluate and comment upon the draft permit action proposed for the subject facility. Permits are drafted to help assure facility compliance with the final RCRA Permit and the applicable requirements of the VHWMR, 9 VAC 20-60.

**Comment Period**

**Begins:** February 25, 2019  
**Ends:** April 11, 2019

The public and the Permittee have forty-five (45) days to review and comment on the draft permit action proposed for the facility.

All persons who believe any condition of a draft permit or proposed permit action is inappropriate, shall raise all reasonably ascertainable issues and submit all reasonably available arguments and factual grounds supporting their position by April 8, 2019. Comments should include sufficient supporting material, including any pertinent technical or legal references and citations believed appropriate. All comments and supporting rationale for such comments must be provided in writing by postal mail or email to:

K. Allyson Lackey, Hazardous Waste Permit Writer  
Department of Environmental Quality  
Office of Financial Responsibility and Waste Programs  
P.O. Box 1105

[www.deq.virginia.gov](http://www.deq.virginia.gov)
All comments received must provide your name, mailing address, phone number, and must be received before the end of the comment period.

**Public Hearing**

The public may request a public hearing. To request a public hearing, the request must be in writing; must state the nature of the issues proposed to be raised in the hearing; and must be made within the public comment period.

**Public Information**

The public may review the Draft Hazardous Waste Management Post-Closure Care and Site-Wide Corrective Action Permit, the application, and this fact sheet at the following locations:

**DEQ Tidewater Regional Office**

Melinda Woodruff  
5636 Southern Blvd.  
Virginia Beach, VA 23462  
Phone: (757) 518-2174  
*Every workday by appointment

**DEQ Office of Financial Responsibility and Waste Programs**

K. Allyson Lackey  
1111 East Main Street, Suite 1400  
Richmond, VA 23219  
Phone: (804) 698-4421  
* Every workday by appointment

**Newport News Public Library, Pearl Bailey Branch**

2510 Wickham Ave.  
Newport News, VA 23607  
(757) 247-8677  
* During normal hours of operation

**Procedures for Reaching a Final Permit Decision**

When making a final decision regarding this proposed permit action, DEQ will consider all written comments received during the 45 day public comment period, and oral and written comments received during the public hearing (if applicable), along with the requirements of the VHWMR. When DEQ makes a final decision to either issue or deny the permit, final notice will be given to the applicant and each person who has submitted comments or requested notice of the final decision. The final notice will include a written response from DEQ to each comment submitted and will indicate any changes in the draft permit action, which may have been made in response to the comments. The proposed permit action will become effective 30 days after the final permit decision notice, unless a later date is specified in the decision or review of the permit is requested, pursuant to the VHWMR, 9 VAC 20-60-80, and the Virginia Administrative Process Act, § 2.2
4000, et seq., of the Code of Virginia and the Virginia Waste Management Board Public Participation Guidelines, 9 VAC 20-10. If no comments request a change in the draft permit, the decision shall become effective immediately upon issuance.