



## Department of Toxic Substances Control

**Matthew Rodriguez**  
Secretary for  
Environmental Protection

Barbara A Lee, Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200

**Edmund G. Brown Jr**  
Governor

July 17, 2018

Mr. David Mendez  
Naval Facilities Engineering Command Southwest  
Environmental Compliance EV1 .3  
1220 Pacific Highway, Bldg. 1, Room  
566 San Diego, CA 92132-5190

### EMERGENCY PERMIT FOR TREATMENT OF HAZARDOUS WASTE, NAVAL AIR FACILITY (NAF), EI CENTRO, IMPERIAL COUNTY, EPA ID NO. CA6170090017

The Naval Air Facility (NAF) El Centro has requested an emergency permit to treat hazardous waste by open detonation. The items requested to be treated by open detonation are as follows:

- one (1) blank 40mm cartridge;
- two (2) electric blasting caps;
- three (3) nonelectric blasting caps;
- three (3) 6 inch detonating cords;
- 75 ammunition cartridges (various ball & calibers);
- one (1) pyrotechnic simulator M116A1 hand grenade; three (3) ground burst L594 pyrotechnic simulators; one (1) marine marker flare;
- two (2) 0.5 caliber ball M2 ammunition cartridges;
- five (5) electric squibs;
- one (1) highly explosive U.S. 100 pound MK1 Mod 4 bomb;
- one (1) high explosive/fragmentation hand grenade;
- one (1) practice hand grenade;
- one (1) high explosive 5 inch warhead with buster adapter;
- and 15 high explosive 20 mm cartridges.

These items were generated from Navy training at the Naval Air Station (NAS), North Island located on the Naval Base Coronado (NBC), California. Due to unstable condition of these items, NAS North Island Explosive Ordnance and Disposal (EOD) personnel have determined that they are explosive and must be destroyed. These items are currently being stored at NAS North Island located on NBC in an EOD safe holding area and are awaiting transport to the NAF Bombing Range in El Centro, California where they will be detonated.

NAS North Island EOD personnel have determined that the items are not safe to ship commercially, but are safe to transport under EOD's special care and handling, and for a limited distance. The NAF Bombing Range in El Centro, California has been chosen as the closest, safest, and most appropriate location to complete the emergency response.

Due to the unstable nature of the items, and as NAS North Island does not have a permit for open detonation treatment of hazardous waste at the NAF Bombing Range in El Centro, the Department of Toxic Substances Control (DTSC) has determined that an emergency permit should be issued.

Based on the authority granted to DTSC, pursuant to Title 22, California Code of Regulations Section 66270.61, DTSC finds there to be imminent and substantial endangerment to human health and the environment and, by way of this letter, issues a temporary emergency permit to NAF El Centro. This permit is not transferable to any other party and may not be used in any other capacity by NAF El Centro. This permit may be revoked by DTSC at any time without process if it is determined that termination is appropriate to protect human health and the environment.

The following requirements are facility-specific conditions of this permit. Failure to comply with any of the following conditions may cause an immediate revocation of this permit, pursuant to Title 22, CCR Section 66270.61 (b)(4), and subject NAF El Centro to legal action by DTSC.

1. Treatment will be conducted at the Naval Air Facility (NAF) Bombing Range in El Centro, California, in accordance with all military safety protocols established for such treatment and according to the procedures contained in the June 26, 2018 emergency permit request.
2. NAF El Centro must notify the Certified Unified Public Agency (CUPA) and local Fire Department that this emergency permit has been issued by DTSC by the effective date.
3. In the event that NAF El Centro identifies any releases of hazardous waste, NAF El Centro must notify DTSC's Permitting Division orally within 24 hours of discovery.
4. The area must be inspected after treatment to ensure that there is no release of hazardous waste from the area. Any untreated waste must be immediately retreated or removed.
5. NAF El Centro must allow inspection of records and of the facility by any duly-authorized representative of DTSC, in order to carry out the purpose of Chapter 6.5, Division 20 of the California Health and Safety Code.
6. Only the items listed above may be treated. Additional quantity or type of hazardous waste may be treated if they follow the same treatment procedures listed in the June 26, 2018 workplan submitted to DTSC. NAF El Centro must notify and request for an authorization from DTSC for any additional items discovered and that require a treatment process not described in the workplan.

7. The issuance of this Permit by DTSC does not release NAF El Centro from any liability or duty imposed by federal or state statutes or regulations, or local ordinances. NAF El Centro must obtain permits required by other governmental agencies, including but not limited to, the applicable land use planning, zoning, air quality, and water quality laws for the treatment operations.
8. Within 10 business days following the expiration of this permit or the execution of treatment operation in whichever is shorter, NAF El Centro must submit the Final Report signed, in accordance with Title 22 CCR, section 66270.11(d) to DTSC and the CUPA. The report must contain following certification statement, "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with 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."

The report must state whether the treatment area has been cleared of all residual hazardous waste generated from this emergency treatment, and if all generated waste has been properly managed. The report must also contain a list of all the hazardous waste that was treated by NAF El Centro and a description of any deviations from the established guidelines of this emergency permit, or information submitted to DTSC.

This temporary emergency permit is effective for ninety (90) days beginning on July 18, 2018 and shall expire on October 15, 2018.

If you have any questions, please contact Hai-Yong Kang at (916) 255-6522 or [hkang@dtsc.ca.gov](mailto:hkang@dtsc.ca.gov)

Sincerely,



Hai-Yong Kang  
Hazardous Substances Engineer  
Permitting Division

David Mendez  
July 17, 2018  
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cc (via-email):

**Roger Vintze,**

[Roger.Vintze@dtsc.ca.gov](mailto:Roger.Vintze@dtsc.ca.gov)

Environmental Program Manager I

DTSC Imperial County CUPA Office

**Alfredo Rios,**

[Alfredo.Rios@dtsc.ca.gov](mailto:Alfredo.Rios@dtsc.ca.gov)

Environmental Program Manager I(Sup)

DTSC Cypress and San Diego Enforcement Branch

**Diana Peebler,**

[Diana.Peebler@dtsc.ca.gov](mailto:Diana.Peebler@dtsc.ca.gov)

Sr. Environmental Scientist

Hazardous Waste Management Program

Berkeley Office