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NSTC GREAT LAKES, IL
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MEMORANDUM TO FILE REGARDING U S EPA REGION V PRELIMINARY
ASSESSMENT/VISUAL SITE INSPECTION 29 THROUGH 21 JULY 1992 NSTC GREAT
LAKES IL
7/29/1992
U S EPA REGION V

MEMORANDUM TO FILE

Date: 03 August 1992

From: FAC3A

Subj: USEPA REGION V PRELIMINARY ASSESSMENT/VISUAL SITE
INSPECTION (PA/VSI) OF 29-31 JULY 1992

Ref: (a) USEPA ltr HRE-8J of 23 July 1992

Date: 29 July 1992

1. Reference (a) announced subject visit to be performed by Mr. Alan Supple and Mr. Mike Gorman of Resource Applications, Inc., a contractor hired by the USEPA. Mr. Mark Retzlaff, Illinois EPA and Mr. Jeffery Arsenault, Defense Criminal Investigative Service, also accompanied Mr. Supple and Mr. Gorman.

2. The inspectors arrived at Building 5 on 29 July at 0800. An in-brief was held in the Bldg 5 conference room with the following personnel in attendance.

Mr. Mike Gorman, Resource Applications Inc.
Mr. Alan Supple, Resource Applications Inc.
Mr. Mark Retzlaff, Illinois EPA
Mr. Jeffery Arsenault, Defense Criminal Investigative Svc
LCDR Hiakawa, PWC Production Officer
LT Randy Ortgiesen, Staff Civil Engineer, NTC
Mr. Bill Masterson, Staff Planner, NTC
Mr. Robert Ogradowski, Environmental Specialist, NTC
Mr. Donn Stiner, Environmental Technician, NTC
Mr. Mark Schultz, Environmental Engineer, PWC.

3. The following items were discussed.

a. LT Ortgiesen made opening remarks, welcoming visitors to the base and describing the base environmental program.

b. Mr. Mark Schultz made opening remarks, describing PWC's environmental program.

c. Mr. Alan Supple remarked that the PA/VSI was being performed as a result of our closure plan and the USEPA was making a RCRA Facility Assessment to prioritize Part A Permit areas for potential releases of hazardous substances. His team wanted to look at the history of hazardous waste management; all waste streams including non-hazardous waste (including refuse, non-regulated special waste and annual waste generation). Mr. Gorman mentioned that past spill reports would be studied to determine if areas had been remediated. Mr. Supple said a summary of findings would be sent to the USEPA, with

recommendations for further actions. The base would get the report summary, but not the recommended actions, as the USEPA would choose to act on these recommendations and would hold them for possible enforcement actions. The next step would be a sampling plan, if warranted.

4. LCDR Hiakawa, LT Ortgiesen and Mr. Masterson left the meeting. The following discussion took place.

a. Bob Ogradowski presented the command environmental brief (Enclosure (1)). Discussed the relationship of the various commands and component commands on base (Property/land owners, who reports to who, extent of base, etc.).

b. The following items were given to the contractors.

1. Master Plan
2. HW Inventory (PWC and NTC)
3. HW Sites (PWC and NTC)
4. Closure Plan
5. Outfall Study
6. Manifests for FY90, 91 and 92.
7. Waste Minimization Survey
8. Base Maps
9. Summary of past spills
10. Listing of Underground Storage Tanks (USTs)

c. The contractors asked how many personnel lived on base, answered approximately 32,000.

d. Mr. Schultz went over PWC waste streams. He noted that part cleaning machines using solvents were now serviced by a contractor who recycles the solvent. Also switching to a non-hazardous solvent. These machines are self-contained. The paint locker at 104A is a less-than-90 days accumulation site. Waste paint is brought in from the job sites. Bldg 2216 has non-regulated AC&R compressor oil. PCB's are stored in Bldg 1511. 88H Incinerator burns medical waste and shredded classified documents.

e. Mr Stiner discussed NTC waste streams. Two questions were asked of Mr. Retzlaff. How do you correct information mistakenly put on a HW label, especially the start accumulation date? Answer: Remove the label and relabel or make the correction on the existing label and note in writing what was wrong, was done to correct the label and who did the correcting. NTC is awaiting analysis of some gas filters to determine their hazardous properties, if any. Are we bound to the 90 day rule? Answer: No, not until the waste analysis is received does the 90 day accumulation time start, if the filters are HW.

f. General discussion on IRP sites, landfills, harbor area, old FFTU, and the operation of the solvent stills in the dry cleaning machines. Also discussed several old sites used to store HW in the past and some building numbers from past inspections that made no sense. Many of the latter believed to be typos. Question arose if lead arsenate waste was stored in building 68H, pesticide shop. This was not answered as it requires further research.

g. A question arose over two permit numbers used in the past. The PWC landfill had a permit number 0978110002 and NTC had a permit number 0971255018. Neither of these two numbers are in use. No information was readily available on either number. More research is needed. Mr. Retzlaff handed over a two page copy of the permit numbers still on file with the IEPA. Mr. Ogradowski will research.

5. The meeting switched to Building 38H, to meet with Hospital personnel. The following Personnel were in attendance.

Mr. Mike Gorman, Resource Applications, Inc.
Mr. Alan Supple, Resource Applications, Inc.
Mr. Mark Retzlaff, Illinois EPA
Mr. Jeffery Arsenault, Defense Criminal Investigative Svc
Mr. Robert Ogradowski, Environmental Specialist, NTC
Mr. Mark Schultz, Environmental Engineer, PWC
LT Brett Covington, Staff Civil Engineer, NHOSP
Mr. Fred Rosen, Environmental Coordinator, NHOSP
HM1 Phil Covill, Environmental Coordinator, NDRI
HMC Horton, Histology Laboratory Supervisor, NHOSP
PO. Troy Humes,

6. The environmental program at NHOSP and NHOSP tenant commands was discussed. The NHOSP uses red bags to dispose of infectious waste. At times, excess material is placed in the hazardous waste locker at Bldg 81H.

Date: 30 July 1992

1. Reconvened the meeting at 0800, Building 5 Conference Room, with the following personnel present.

Mr. Mike Gorman, Resource Applications, Inc.
Mr. Alan Supple, Resource Applications, Inc.
Mr. Mark Retzlaff, Illinois EPA
Mr. Jeffery Arsenault, Defense Criminal Investigative Svc
Mr. Robert Ogradowski, Environmental Specialist, NTC
Mr. Donn Stiner, Environmental Technician, NTC
Mr. Mark Schultz, Environmental Engineer, PWC
Mr. Kelly Devereaux, Environmental Technician, PWC

2. Selected sites to visit (Enclosure (2)). The lead arsenate dates from 1982/3. Need to review records to determine how much was disposed of. Mark Schultz discussed base recycling program, what NTC/PWC/DRMO do. The precious metals program is managed by DRMO. Silver recovery machines are in use at various locations around the base. Currently conducting waste analysis of the discharge from the machines to the sanitary system. The open burning permit for the FFTD has been reapplied for. Discussed NPDES permits and the results of the NTC Outfall study. Mr. Schultz identified the water treatment plants and outlined their operation. Discussed current status of IRP sites, Landfills, harbor dredging and 144 gas station clean-up.

3. Mr. Supple had some information on three spills prior to 1985. On Sep 12, 1984, 2,000 gallons of diesel fuel from Tank 11E spilled into the containment area. On Sep 18, 1984, 150 gallons of diesel fuel spilled adjacent to Bldg 11. On Mar 09 1981, .5 gallons of paint and thinner was spilled adjacent to Bldg 13. NTC had no paperwork on these spills. Further research is needed to determine if any paperwork exists on these spills. The contractors need copies of all reportable quantity spill reports. NTC personnel will supply this information to the contractor's office. All spill locations marked on base maps.

4. Commenced site visits at 1020.

a. Bldg 11 - Met with Mr. Bob Kane, who took visitors on a tour of the sewage plant operation. Discussed past sewage spills.

b. Bldgs 11&12 - Mr. Greg Pye took us on tour of the electrical plant. Observed solvent satellite accumulation area. PWC converting to a non-hazardous solvent.

c. Bldg 135 - Material storage.

d. Bldg 11J - Looked at boiler equipment and talked about its operations.

e. Tank 11E - Looked at the spill area from 1984 spill and parking lot where non-hazardous waste oil is stored.

f. Took pictures of harbor dredge spoil area.

g. Bldg 52 - Sat. Accum area with waste solvent in drum. Mr. Gorman asked when drum would be filled. Staff answered around Nov, 92. Have gone to non-hazardous solvent (Simple-Green), as a result this is the last hazardous waste from this bldg.

h. Took pictures of harbor.

i. Bldg 104A - Mr. Bud Cheeseman, PWC Code 500, showed us the paint locker and paint booth at 104A. Also saw non-hazardous parts cleaners (2).

Joined by Mr. Fred Rosen.

j. Bldg 1H - NDRI, HM2 Covill showed us the Dental Laboratory. Discussed autoclave use.

k. Bldg 38H - NDSL, XO, LCDR Struempler took us on tour of the drug screening laboratory. Discussed radioactive, hazardous and medical waste streams.

l. Bldg 81H Basement - Looked at radioactive waste accumulation site.

m. Bldg 81H Second Deck - Noted accumulation site locker and expired material storage.

n. Bldg 88H - Incinerator and ash storage.

o. Bldg 200H - Examined satellite accumulation site in Histology Lab. Observed infectious waste locker on 11th floor.

Mr. Rosen departed.

p. Bldg 2710 - Spill site at gas station, UST's.

q. Bldg 3114A - Observed area of removed UST.

r. Bldg 1712 - Accumulation Locker.

s. Bldg 3216 - UST (21-T-12)

t. Bldg 3511 - Tanks

u. Landfill leaching south of Warehouse 3504.

v. Bldg 3216A - Ballast (PCB) spill area.

w. Bldg 3216B - UST (Waste Oil) and parts washer.

Date: 31 July 1992

1. Reconvened the meeting at 0800, Building 5 Conference Room, with the following personnel present.

Mr. Mike Gorman, Resource Applications, Inc.
Mr. Alan Supple, Resource Applications, Inc.
Mr. Jeffery Arsenault, Defense Criminal Investigative Svc
Mr. Robert Ogradowski, Environmental Specialist, NTC

Mr. Donn Stiner, Environmental Technician, NTC
Mr. Mark Schultz, Environmental Engineer, PWC
Mr. Kelly Devereaux, Environmental Technician, PWC

2. Commenced site visits.

Joined by EM1 Krpalek, SSC Safety.

- a. Bldg 520 - Three storage areas.
- b. Bldg 521 - Storage area.
- c. Bldg 522 - Discussed material storage area and containment UST.

Joined by ICC Ziegler, ESS Safety Officer.

d. Bldg 239 - Met with Chief McNeely, who explained the mercuric nitrite collection process. Oily rags are containerized and stored outside Bldg 239. Discussed oil/water separator and tanks associated with Bldgs 239 and 229. Noted petroleum residue on ground outside the west side of Bldg 239. (Will submit TF-1 to PWC to clean up.)

- e. Bldg 324 - Walked around building.
- f. Bldg 325 - Observed spill site (from 1990 diesel spill) and waste oil UST. Discussed day tanks with building personnel.
- g. Bldg 329 - One UST and Two aboveground storage tanks.

EM1 Krpalek and ICC Ziegler depart.

- h. Bldg 415 - Old HW storage site.
- i. Bldg 144 - Waste oil UST.
- j. Bldg 105 - Old HW storage site.
- k. Bldg 145 - Old HW storage site.

Mr. Jeffery Arsenault departed the NTC complex.

- l. Bldg 68H - Pesticide shop.
- m. Bldg 2016 - AC&R compressor oil.
- n. Visited old FFTU IRP Site and Golf Course landfill.
- o. Bldgs 1517 and 1511 - Asbestos and PCB storage areas and PCB spill area.

p. Bldg 3212C - With Mr. Bob Thompson and Mr. Les Heise, inspected storage area and DRMO yards.

q. Bldg 912 - Old HW storage area.

Joined by AMCS Piver and HTC Wear, RTC Safety Officers.

r. Bldg 910 - Gun range satellite area.

s. Bldg 1014 - OBA canister satellite area.

t. Bldg 1127 - Gas mask filter satellite area.

u. Bldg 1212 - Old HW storage area, satellite area, silk screening shop (IRP), new accumulation site and diesel fuel spill area.

v. Bldg 1312 - Discussed silver recovery unit with building personnel.

w. Bldg 1410 - FFTD

3. Returned to Building 5 for outbrief at 1430. Following personnel were in attendance.

Mr. Mike Gorman, Resource Applications, Inc.
Mr. Alan Supple, Resource Applications, Inc.
Mr. Robert Ogrodowski, Environmental Specialist, NTC
Mr. Donn Stiner, Environmental Technician, NTC
Mr. Mark Schultz, Environmental Engineer, PWC
LT Randy Ortgiesen, Staff Civil Engineer, NTC

4. The following items were discussed.

a. The report will document some 25-35 Solid Waste Management Units and 10-15 areas of concern which will be forwarded to USEPA Region V. Contractors noted no major area of concern. Impressed with cooperation of all NTC/PWC complex personnel. Only area of concern was the petroleum soaked soil at Bldg 239. Report will reach EPA around 30 Sep 92. NTC does not get the recommendations and conclusions section of the report. Will get a copy of the report summary. Any additional questions the contractors have will be faxed to NTC.

b. LT Ortgiesen made closing remarks.

5. Meeting adjourned at 1530. Mr. Supple and Mr. Gorman left the NTC Complex.

Very respectfully

D.O. STINER

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