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NB NORFOLK
5090.3a

PCB INSPECTION CHECKLIST REPORT WITH TRANSMITTAL NS NORFOLK VA
3/1/1982
U S EPA REGION III

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
CENTRAL REGIONAL LABORATORY
839 BESTGATE ROAD
ANNAPOLIS, MARYLAND 21401

March 1, 1982

Mr. Steve Olson
Code 114
Commander Atlantic Division
Naval Facilities Engineering Command
Norfolk, Virginia 23511

Dear Mr. Olson:

On January 20, 1982 the EPA, Central Regional Laboratory conducted a PCB inspection was conducted at the Naval Air Rework Facility to determine its compliance with TSCA regulations.

Enclosed is a copy of the inspection report including the PCB Inspection Checklist, completed during the inspection.

Thank you for your cooperation and time spent assisting us in this inspection.

Should you have any questions regarding the enclosed report, please contact this office at (301) 224-2740.

Sincerely,

William M. Thomas

William M. Thomas
Engineering Technician

Enclosures
a/s

WMT:tlb

ACTIVITY

A. GENERAL				B. IN SERVICE					C. REMOVED FROM SERVICE					D. STORAGE							E. DISPOSAL						
(1) ID No.	(2) Location	(3) Testing ppm	date	(4) Container D	C	T	(5) Quantity (kg)	(6) Condition	(7) Container D	C	T	(8) Quantity (kg)	(9) Date Removed	(10) Sent to	(11) Container D	C	T	(12) Quantity (kg)	(13) Date Received	(14) From	(15) Date Transferred	(16) Sent to	(17) Container D	C	T	(18) Quantity (kg)	(19) Date to Hauler	(20) Hauler/Disposal Site	21
E-692096	LP-21					X	725	OK																				
PCV8395-01	LP-167 Door 34					X	1775	OK																				
PAV1723-01	LP-167 Door 13					X	1840	OK																				
PWC #355	SW Inside V-4					X	850	OK																				
PWC #356	NE Inside V-4					X	850	OK																				
F-959355	Front outside V-28					X	550	OK																				
F-963420	Inside NW V-28					X	850	OK																				
7015400	Vault outside V-28					X	1180	OK																				
F-950356	Vault Outside V-28					X	550	OK																				
F-52759464P	Padmount V-9					X	3080	OK																				
PWC #333	V-43					X	580	OK																				
PWC #357	Cage V-60					X	1100	OK																				
PWC #343	NE Corner V-90					X	580	Leak	Sample collected from concrete pad																			
PWC #342	Comp Rm. SE V-90					X	1100	Leak	blower drain should be sealed																			
H-26704269	Outside V-146					X	265	OK																				

F. SUMMARY

22 Number of PCB:
- Containers (drums)
- Capacitors
- Transformers

15

(23) Weight of PCBs in:
- Containers (drums) kg
- Capacitors kg
- Transformers 15875 kg

(24) Subtotal D C T kg

(25). TOTAL kg

D C T kg

D C T kg

D C T kg

D C T kg

D C T kg

A. GENERAL				B. IN SERVICE					C. REMOVED FROM SERVICE					D. STORAGE							E. DISPOSAL						
(1) ID No.	(2) Location	(3) Testing ppm	(3) Testing date	(4) Container D	(4) Container C	(4) Container T	(5) Quantity (kg)	(6) Condition	(7) Container D	(7) Container C	(7) Container T	(8) Quantity (kg)	(9) Date Removed	(10) Sent to	(11) Container D	(11) Container C	(11) Container T	(12) Quantity (kg)	(13) Date Received	(14) From	(15) Date Transferred	(16) Sent to	(17) Container D	(17) Container C	(17) Container T	(18) Quantity (kg)	(19) Date to Hauler	(20) Hauler/Disposal Site	(21)
6536628	U-132 Room 110					X	2910	OK																					
6536630	U-132 Room 110					X	2910	OK																					
6540816	U-132 North					X	725	OK																					
3412-1	U-132 Room 210					X	2020	OK																					
3412-2	U-132 South					X	2020	OK																					
PWC-806	#1-LF-18					X	2250	DRIP																					
PWC-807	#1-LF-18					X	2250	DRIP	slight																				
PWC-808	#2-LF-18					X	2250	DRIP	slight																				
PWC-809	#2-LF-18					X	2250	DRIP	slight																				
PWC-810	#3-LF-18					X	1250	DRIP																					
PWC-811	#3-LF-18					X	1250	DRIP	slight																				
G-856213A	Outside Vault LF-18					X	775	OK																					
G-856213B	Outside Vault LF-18					X	775	OK																					
7026443	Outside Vault LF-34					X	1360	OK																					
H-3154637OP	Outside Vault LF-38					X	230	OK																					
G-852890	Outside Vault LF-53					X	1250	OK																					
E-692096	LP-21					X	725	OK																					
PCV8395-01	LP-167-Door 34					X	1775	OK																					
PAV1723-01	LP-167-Door 13					X	1840	OK																					
* PWIC-614 0221-7797	LP-36	584				X	880				X	880	5-81	LP-36	(waiting disposal)														

SUMMARY

22 Number of PCB:
- Containers (drums)
- Capacitors
- Transformers

23 Weight of PCBs in:
- Containers (drums)
- Capacitors
- Transformers

	D	C	T		D	C	T		D	C	T		D	C	T		D	C	T	
Containers (drums)																				
Capacitors																				
Transformers				20								1								
Weight of PCBs in:																				
Containers (drums)				kg												kg				kg
Capacitors				kg												kg				kg
Transformers				31695 kg												880 kg				kg
(24) Subtotal				kg												kg				kg
(25) TOTAL				kg												kg				kg

A. GENERAL				B. IN SERVICE					C. REMOVED FROM SERVICE					D. STORAGE							E. DISPOSAL					
(1) ID No.	(2) Location	(3) Testing ppm	(3) Testing date	(4) Container D	(4) Container C	(4) Container T	(5) Quantity (kg)	(6) Condition	(7) Container D	(7) Container C	(7) Container T	(8) Quantity (kg)	(9) Date Removed	(10) Sent to	(11) Container D	(11) Container C	(11) Container T	(12) Quantity (kg)	(13) Date Received	(14) From	(15) Date Transferred	(16) Sent to	(17) Container D	(17) Container C	(17) Container T	(18) Quantity (kg)	(19) Date to Hauler	(20) Hauler/Disposal Site	(21) Code
1280-6661	X-318										X	100g	12-81	SP-area															
1280-6662	X-318										X	250g	12-81	SP-area															
1280-6663	X-318										X	115g	12-81	SP-area															
1280-6664	X-318										X	14gal	12-81	P-73															
1280-6664	X-318										X	14gal	12-81	P-73															
1280-6664	X-318										X	14gal	12-81	P-73															
1280-6665	X-318										X	35gal	12-81	F. Story															
1280-6665	X-318										X	35gal	12-81	F. Story															
1280-6665	X-318										X	35gal	12-81	F. Story															
1280-6666	X-318										X	5gal	12-81	D&S															
5808935	X-318										X	16gal	12-81	Yard															
6808934	X-318										X	16gal	12-81	Yard															
7147954	X-318										X	32gal	12-81	Yard															

F. SUMMARY

(22) Number of PCB:

	B. IN SERVICE	C. REMOVED FROM SERVICE	D. STORAGE	E. DISPOSAL
Containers (drums)				
Capacitors				
Transformers			13	

(23) Weight of PCBs In:

	B. IN SERVICE	C. REMOVED FROM SERVICE	D. STORAGE	E. DISPOSAL
Containers (drums)	kg	kg	kg	kg
Capacitors	kg	kg	kg	kg
Transformers	kg	kg	731 kg	kg
(24) Subtotal	kg	kg	kg	kg
(25). TOTAL	kg	kg	kg	kg

A. GENERAL				B. IN SERVICE					C. REMOVED FROM SERVICE					D. STORAGE							E. DISPOSAL					
(1) ID No.	(2) Location	(3) Testing ppm	(3) Testing date	(4) Container D	(4) Container C	(4) Container T	(5) Quantity (kg)	(6) Condition	(7) Container D	(7) Container C	(7) Container T	(8) Quantity (kg)	(9) Date Removed	(10) Sent to	(11) Container D	(11) Container C	(11) Container T	(12) Quantity (kg)	(13) Date Received	(14) From	(15) Date Transferred	(16) Sent to	(17) Container D	(17) Container C	(17) Container T	(18) Quantity (kg)	(19) Date to Hauler	(20) Hauler/Disposal Site	(21) CCD
0221-6661	X-318																												A
0221-6662	X-318	100%													x														A
0221-6663	X-318	100%													x														A
0221-6664	X-318	100%													x														A
0221-6665	X-318	742													x														A
0221-6666	X-318	221													x														A
0221-6667	X-318	194													x														A
0221-6668	X-318														x														A
0221-6669	X-318														x														A
0221-6670	X-318														x														A
0221-6671	X-318														x														A
0221-6672	X-318														x														A
0221-6673	X-318														x														A
0221-6674	X-318	316													x														A
0221-6675	X-318	384													x														A
0221-6676	X-318	184													x														A
0221-6677	X-318														x														A
0221-6678	X-318														x														A
0221-6679	X-318	100%													x														A
0221-6680	X-318	100%													x														A
0221-6681	X-318	219													x														A
0221-6682	combined w other mat.														x														A
0221-6683	" " " "																												A
0221-6684	X-318	100%																											A
0221-6685	X-318	461													x														A
0221-6686	X-318														x														A
0221-6687	X-318	550													x														A

F. SUMMARY

(22) Number of PCB:
- Containers (drums)
- Capacitors
- Transformers

(23) Weight of PCBs in:
- Containers (drums) ____ kg
- Capacitors ____ kg
- Transformers ____ kg

(24) Subtotal ____ kg

(25). TOTAL ____ kg

	B. IN SERVICE	C. REMOVED FROM SERVICE	D. STORAGE	E. DISPOSAL
	D C T	D C T	D C T	D C T
(22) Containers (drums)				
(22) Capacitors				
(22) Transformers				
(23) Containers (drums)		____ kg	____ kg	____ kg
(23) Capacitors	____ kg	____ kg	____ kg	____ kg
(23) Transformers	____ kg	____ kg	____ kg	____ kg
(24) Subtotal	____ kg	____ kg	____ kg	____ kg
(25). TOTAL	____ kg	____ kg	____ kg	____ kg

A. GENERAL				B. IN SERVICE					C. REMOVED FROM SERVICE						D. STORAGE								E. DISPOSAL						
(1) ID No.	(2) Location	(3) Testing		(4) Container			(5) Quantity (kg)	(6) Condition	(7) Container			(8) Quantity (kg)	(9) Date Removed	(10) Sent to	(11) Container			(12) Quantity (kg)	(13) Date Received	(14) From	(15) Date Transferred	(16) Sent to	(17) Container			(18) Quantity (kg)	(19) Date to Hauler	(20) Hauler/Disposal Site	(21) Code
		ppm	date	D	C	T			D	C	T				D	C	T						D	C	T				
0221-6688	X-318	1335													X														A
0221-3389	X-318	192													X														A
0221-6690	X-318	284													X														A
0221-6691	X-318	176													X														A
0221-6692	X-318	1818													X														A
0221-6693	X-318	486													X														A
0221-6695	X-318	2375													X														A
0240-6661	X-318														X														A

F. SUMMARY

(22) Number of PCB:
- Containers (drums)
- Capacitors
- Transformers

(23) Weight of PCBs in:
- Containers (drums) kg
- Capacitors kg
- Transformers kg

(24) Subtotal kg

(25). TOTAL kg

	B. IN SERVICE	C. REMOVED FROM SERVICE	D. STORAGE	E. DISPOSAL
	D C T	D C T	D C T	D C T
Containers (drums)				
Capacitors				
Transformers				
Weight of PCBs in: Containers (drums)				
Capacitors				
Transformers				
Subtotal				
TOTAL				

DRAFT

PCB INSPECTION CHECKLIST

GENERAL INFORMATION

i. Facility Name and Address:

Naval Air Rework Facility
Norfolk, Va 23511
(Naval Air Station)

ii. Related Firms:

iii. Type of Establishment:

Naval Air Station

iv. Type of Operation:

v. Size of Operation:

vi. Names, Titles, and Addresses of Principal Officers, Partners or Owners:

1. W. L Brown - Plant Engineering Div. Director
2. Bob Racicot - NARF
3. Paul Rakowski - LANTDIV
4. Steve Olson - LANTDIV - (Facility contact)

vii. Date of Inspection: Jan 20, 1982

viii. Time of Inspection: 0900

ix. Agent-in-Charge:

x. Persons Interviewed (Names, Titles, Phone Numbers):

1. George Drury PWC Gen. Frmn.
2. L. Gayle Humphreys PWC Frmn.
3. K. P. Clarke PWC H.V. Elec.
4. John W. Wright PWC Dist. Div. Director

xi. Reason for Inspection: PCB inventory

xii. Remarks:

xiii. Inspector Name: WILLIAM M. THOMAS JR.

xiv. Inspector Signature: William M. Thomas Jr.

Naval Air Rework Facility Norfolk, Va

PCB COMPLIANCE INSPECTION REPORT

A. INVENTORY

1. As of July 2, 1978, did facility contain in service, stored for future use, or stored for disposal:

   a. 50 or more large high or low voltage capacitors? YES___ NO ✓ N/A*___ C/A**___

   b. 1 or more PCB transformers? YES ✓ NO___ N/A___ C/A___

   c. 45 kgs (99.4 lbs) or more PCB chemicals, substances, or mixtures? YES ✓ NO___ N/A___ C/A___

2. Does the facility use large capacitors?

   YES___ NO ✓ N/A___ C/A___

   (If yes, characterize below.)

   a. Large High Voltage

      1) Total number of large high voltage PCB capacitors _____

      2) List number, size, location, and type of large high voltage capacitors below:

No.	Size	Type	Kg PCBs Each	Areas Located	No. Properly Marked	No. in Service	No. Stored for Use	No. Stored for Disposal

      3) Total number of large, high voltage non-PCB capacitors _____

*Not applicable
**Comments attached

b. Large Low Voltage

1) Total number of large, low voltage PCB capacitors _____

2) List number, size, and type of large low voltage capacitators

No.	Size	Type	Kg PCBs Each	Area(s) Located	No. Properly Marked	No. in Service	No. Stored for Use	No. Stored for Disposal

3) Total number of large, low voltage non-PCB capacitors _____

c. Other Capacitors

1) Total number of other capacitors with PCBs _____

2) List of other capacitors

No.	Size	Type	Each	Area (s)	No. in Service	No. Stored for Use	No. Stored for Disposal

3) Total number of other non-PCB capacitors _____

3. Does the facility use PCB transformers?

(If yes, characterize below) YES ✓ NO___ N/A___ C/A___

No.	Size	Type	Gals. of PCBs or Mixtures Each	No. Properly Marked	Area(s) Located	No. in Service	No. Stored for Use	No. Stored for Disposal
a PCB inventory from the NARF facility is attached to this report								

4. Does the facility contain other PCBs or PCB equipment (e.g., electromagnets, electric motors, hydraulic systems, heat transfer systems, compressors, containers of PCBs or PCB mixtures?

YES ✓ NO___ N/A___ C/A___

(If yes, characterize below)

Item	Kg PCB/ Gal. Liquid	Size	No. Properly Marked	No. in Service	No. Stored for Use	No. Stored for Disposal
this information is also included in inventory						

5. Based on the above inventory, what is the estimated amount of PCB substances, chemicals, or mixtures in service or stored for disposal at this facility?

In Service 46690 (kgs)

In Storage for Use NONE (kgs)

* In Storage for Disposal 880 kg - Tran. recently taken out of service
731 GALS. (TRANS) (~~kgs~~)
35 DRUMS (PCB contaminated material)

Total _____ (kgs)

* The material being stored until disposal was generated at the entire Air facility in Norfolk. This includes the Naval Air Base and the Naval Air Rework facility combined.

6. Were there observations of leaks or spills or any signs of improper disposal of PCB substances or mixtures?
(If yes, document and sample.) YES ✓ NO___ N/A___ C/A ✓
very minor leaks or drips

7. Was there any indication that waterways in the vicinity have been contaminated by spills, leaks, or improper disposal?
(If yes, document and sample.)
YES___ NO ✓ N/A___ C/A___

8. Were samples collected for analysis of PCB residual concentration?
YES ✓ NO___ N/A___ C/A___
one sample collected

B. STORAGE AND HANDLING

1. Location:

a. Does the facility have its own storage site for PCBs?
YES ✓ NO___ N/A___ C/A___

b. If the storage site is not within the boundary of the facility, give the site's name and address._____

_____

2. Physical requirements: Does storage site meet requirements?
YES___ NO___ N/A___ C/A___

a. Provide protection from rainfall? YES ✓ NO___ N/A___ C/A___

b. Meet floor requirements with 6-inch continuous curbs? YES ✓ NO___ N/A___ C/A___

c. Meet containment volume requirements?
YES___ NO___ N/A___ C/A___

i) What is total containment volume of storage site (width x length x height)? unknown

ii) What is the internal volume of the largest PCB article or container stored within?
250 gal transformer

iii) What is the total internal volume of all containers within the storage site?
unknown

- Is item i) greater than 2 times item ii)
  YES ✓ NO___ N/A___ C/A___

  or 25% of item iii) above? YES___ NO___ N/A___ C/A___

d. Is the area within the curbed area void of drains, valves, expansion joints, or other openings?

YES ✓ NO___ N/A___ C/A___

(If no, document location of opening, drainage path, and ultimate disposal location in log book.)

e. Is storage site located above the 100 year flood water elevation level?

YES ✓ NO___ N/A___ C/A___

f. Are storage areas adequately marked? YES ✓ NO___ N/A___ C/A___

3. Containers:

a. Are all PCB storage containers which are located within storage areas marked and dated?

YES ✓ NO___ N/A___ C/A___

b. Do PCB containers comply with DOT specifications?

YES ✓ NO___ N/A___ C/A___

4. Storage Site Operations:

a. Are storage containers marked and arranged so they can be located by date?

YES ✓ NO___ N/A___ C/A___

b. Are there any large high voltage capacitors next to the storage site?

YES___ NO ✓ N/A___ C/A___

c. Do observations indicate good housekeeping procedures?

YES ✓ NO___ N/A___ C/A___

d. Is moveable equipment decontaminated by approved procedures?

YES ✓ NO___ N/A___ C/A___

e. Are PCB containers stored and handled in a manner that protects them from accidental breakage or damage?

YES ✓ NO___ N/A___ C/A___

5. Other Storage Areas:

a. Are any non-leaking PCB articles temporarily being stored outside prescribed storage area?

YES___ NO ✓ N/A___ C/A___

Have they been there for fewer than 30 days?

YES___ NO___ N/A___ C/A___

b. Are there any large high voltage capacitors next to the storage site?

YES___ NO___ N/A___ C/A___

i. Are they on pallets? YES___ NO___ N/A___ C/A___

ii. Is there adequate space within the storage site to contain 10% of the volume of the above mentioned capacitors?

YES___ NO___ N/A___ C/A___

C. DECONTAMINATION

1. Does the facility drain or cleanse PCB transformers or other equipment containing PCB substances or mixtures prior to disposal?

YES___ NO ✓ N/A___ C/A___

2. Is the drainage and solvent filling site adequate to protect against spills and leaks and consequent contamination of surrounding area and waterways?

YES___ NO___ N/A___ C/A___

3. Do solvents to be used for removing PCBs contain less than 0.05% PCBs?

YES___ NO___ N/A___ C/A___

4. Was a sample of the solvent which was used for PCB removal obtained?

YES___ NO___ N/A___ C/A___

5. Was the rinse volume of the dilutant approximately equal to the container's total volume?

YES___ NO___ N/A___ C/A___

6. Are PCB containers completely filled with solvent and allowed to stand for 18 hours before being drained?

YES___ NO___ N/A___ C/A___

7. Are the drained PCB chemical substances or PCB solvent mixtures properly disposed of or stored?

YES___ NO___ N/A___ C/A___

8. Are solvents or materials which have been used for decontamination of PCB equipment disposed of or stored in the same manner as PCB mixtures?

YES___ NO___ N/A___ C/A___

9. If decontamination procedures were not observed during inspection, did facility representatives demonstrate knowledge of proper decontamination procedures?

YES___ NO___ N/A___ C/A___

10. Does facility have written decontamination procedures?

YES___ NO___ N/A___ C/A___

D. RECORDS

1. Do records indicate:

a. Date PCBs are removed from service? YES ✓ NO___ N/A___ C/A___

b. Date placed in storage? YES ✓ NO___ N/A___ C/A___

c. Date of receipt of PCB materials? YES ✓ NO___ N/A___ C/A___

2. Do records indicate the total quantity of PCB articles, substances, or mixtures remaining in service at the end of the calendar year?

YES ✓ NO___ N/A___ C/A___

3. Do records of containers identify contents, such as liquids or capacitors?

YES ✓ NO___ N/A___ C/A___

4. Do records indicate the quantity of large high or low voltage capacitors remaining in service?

YES ✓ NO___ N/A___ C/A___

5. Do records indicate the location of the initial disposal or storage facility for PCBs removed from service?
(If yes, list location of facility.) YES ✓ NO___ N/A___ C/A___

Building X-318

PCB storage area

6. Do records indicate name of owner or operator of disposal or storage facilities?
(If yes, list name of owner or operator.)

YES ✓ NO___ N/A___ C/A___

7. Does annual report include records of disposition of PCB chemicals, articles, and mixtures?

YES ✓ NO___ N/A___ C/A___

8. Does annual report contain:

a. Date and source of PCB articles, chemicals, and mixtures received?

YES ✓ NO___ N/A___ C/A___

b. Date and type of articles, chemicals, and mixtures removed from service?

YES ✓ NO___ N/A___ C/A___

c. Accounting of amount received, amount removed, and amount remaining at facility?

YES ✓ NO___ N/A___ C/A___

9. Are pertinent documents, correspondence, or permits to or from federal, state, or local agencies maintained for a period of five years?

YES ✓ NO___ N/A___ C/A___