DEPARTMENT OF THE NAVY
NAVAL ORDNANCE STATION
INDIAN HEAD, MARYLAND 20640-5000

IN REPLY REFER TO

5090
Ser 0431A/260

DEC 23 1988

Environmental Protection Agency
Region III
Attn: Mr. Sherman Latchaw (Code 3HW32)
841 Chestnut Building
Philadelphia, PA 19107

Gentlemen:

We have reviewed the draft RCRA Facility Assessment (RFA) forwarded by your letter of October 23, 1988. Our comments are attached as an enclosure.

Since your Visual Site Inspection, I have established an Environmental Task Team to correct shortcomings in the Station's environmental program. I'm sure you would be pleased by our renewed discipline in controlling both new and waste hazardous materials and by the improvement in our overall "housekeeping."

We were impressed with the detail of this comprehensive report. A great deal of information was gathered in a short period of time. Consequently, our comments are intended to correct minor errors or provide additional information. As you requested, my certification follows:

> 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.

These comments were prepared under the direction of Mr. Peter Ritzcovan of my staff. Mr. Ritzcovan is available at (301) 743-4210 to answer any questions you might have.

Sincerely,

G. F. WENDT
Captain, USN
Commanding Officer

Encl:
(1) Comments On Draft RCRA Facility Assessment Report

Naval Ordnance Station
Indian Head, MD 20640-5000
Comments
On
Draft RCRA Facility Assessment Report

Page 2 - Table 1 may need revision based on changes in the body of the text. For example, SMU No. 7 should be inactive because the drain system was closed prior to the NACIP Initial Assessment Study in 1982. At this time all mercury wastes were drummed and transported to another location. See further comments under page 40 and 41.

Page 5 - The map location of each SMU and AOC should be verified. A spot-check showed0SMU No. 39 and AOC K are not at the locations shown on Figure 1.

Page 6 - Fourth sentence under ownership should read, "The proving ground itself was situated in a funnel-shaped valley running between two bluffs which opened toward the Potomac River. This area is identified in the report as AOC F."

Page 7 - Change last sentence to read, "The cast process initially used nitrocellulose-nitroglycerin based materials to manufacture such rocket motors as Bullpup and Talos. Beginning in the late 1950's and early 1960's, elastomeric binders and crystylline oxidizers were increasingly used to manufacture composite propellants for Sidewinder 1C, Tarter and other tactical rocket motors. Loading of warheads with plastic bonded explosives (PBX) is also carried out in their facilities."

Page 8 - In the first paragraph, last sentence, add the following, "on a pilot scale but full scale production facilities were not operated."

Page 8 - The last paragraph should read "Moser" rather than Mosher (two instances).

Page 9 - The permits given are the ones listed in the Part B permit application of 1985 and have been renewed as necessary. Air Permits for open burning at the time of the Visual Site Inspection were 87-216-AP and 87-207-AP which expire on 01 November 1988. NPDES MD0003158 was reissued by EPA and will expire on 30 April 1993. NPDES permit number MD6620885 was reissued by Maryland as 88-DP-2528 and will expire on 30 April 1993. Also, the Station submitted a Part B application for open burning of explosives at four sites under 40 CFR 264, Subpart X to EPA III on 08 November 1988.

Page 11 - Revise paragraph (c) to read, "The extrusion plant was producing solventless double base propellant at the time of the VSI."

Page 12 - Revise the first line to read, "the burning ground for treatment ...." (Treatment rather than disposal as explained in the recent Part B.)

Page 14 - Even though Reference 1 states that 44 cubic feet of used paint filters were generated in 1981, we believe 13 tons to be an excessive estimate for this volume of filters. A more reasonable estimate would be less than 1/2 ton in 1981 and less than one ton in 1979. The paint shop total generation of solid waste including empty paint containers, rags, etc., probably was on the order of 10 tons or less in any one year.

Page 15 - The last line should read, ". . .in conductive plastic lined cans. Propellants are color coded blue and NG slums are color coded yellow."

Page 16 - This table reproduces table C-2 of Ref. 6, titled "Typical Controlled Hazardous Substances and Associated Hazards".

Page 17 - This table reproduces table C-1 of Ref. 6, titled "Chemical and Physical Nature of Typical Controlled Hazardous Substances".

Page 18 - In paragraph 2(b), the average storage time is 3 to 60 days because only 200 gallons can be processed through the batch recovery system every 6 to 9 days.

Page 18 - In paragraph (c) regarding PCB's, reference 3 is a 1982 report. Current storage is much less than one ton being held for less than one year pending generation of an economical shipment quantity.

Page 19 - Next to the last paragraph add so that the paragraph reads "discharge of heptane contaminated water to Mattawoman Creek after analysis confirmed the amount of dissolved heptane was below 10 mg/1."

Page 19 - In the third paragraph from the end, revise the last sentence to read, "One sample found a concentration of 30 mg/1 of arsenic in the lechate from the landfill. Monitoring is being conducted to determine trend of arsenic level in surface water and sediment".

Page 35 - Date of start-up should be 09 October 1987 with usage on a limited (less than 90 days) basis and increased usage in January, 1988, and fully permitted usage on 15 April 1988. The State of Maryland allowed limited use of this facility because it afforded increased segregation of waste and because of the December, 1987, fire in the vicinity of SWMU #1.

Page 36 - Release controls - Only five bays are diked with epoxy coating. The remaining three bays have no dike and no coating on the concrete floor.

Page 40 - Unit description - Revise the next to last sentence of the first paragraph to read, "approximately 30 pounds of mercury is contained in the glassware used to analyze NG.

Page 41 - Date of Closure - Add to the first paragraph, "Prior to the June, 1982, Initial Assessment Study, floor drains were plugged and procedures were changed to collect all mercury contaminated wastewater in drums for off-site treatment/disposal so that laboratory releases of mercury ceased prior to June, 1982. All building 766 wastewater drains were connected to the Sewage Treatment Plant in 1985."

Page 59 - (Also see comments for page 76.) Standard procedure has always been to use kerosene or #2 fuel oil to ignite and sustain the fire required for thermal treatment of explosive contaminated materials. Even though small amounts of contaminated fuel oil and spill residue may have been used at this site, waste lubricating oils were routinely recycled and the use of waste oil was discouraged by Station management.

Page 70 - Unit description - The volume is approximately 80,000 gallons. Add to the description "This tank receives spent sulfuric acid and sodium hydroxide from regeneration of the demineralizer columns used to treat boiler feedwater. This unit occasionaly results in pH violations at NPDES outfall IW 40 because stoichiometric amounts of acid and caustic are not currently used in the regeneration cycles."

Page 72 - Wastes managed - Revise last sentence to read, "Nitroguanidine is an explosive; methylcellulose is a nonexplosive water conditioning chemical used in processing."

Page 74 - Add to the end of the first paragraph, "Burial of unserviceable rifles and motor casings would have been an acceptable procedure thirty years ago to prevent conversion of these items to unauthorized use."

Page 76 - Unit description - Revise to read, "This unit is a storage area for drums of waste oil and oil spill residue located adjacent to the Decontamination Burn Point."

Page 76 - Date of Closure - Revise to read, "closure began in 1987".

Page 76 - Waste Managed - Revise to read, "The unit was used for the storage of oil spill residue and waste oil from the powerhouse pending removal to an authorized disposal site".

Page 77 - The area is used by the labor shop (part of the carpenter shop) to store equipment. The labor shop is occasionally called on to assist in clean-up of oil spills and repair of underground tanks. Empty drums are spares; partial drums contain contaminated oil which are being collected for recycling through DRMO.

Page 78 - Change "nitrocellulose" to "triethylene glycol dinitrate". The plant is designed to produce liquid nitrate esters, not solids.

Page 79 - Unit description - Delete "6,000 gallon tank (two compartments)" and add "two 1,600 gallon neutralization tanks."

Page 80 - Release controls - Revise to read, "The slums are placed in two static-conducting plastic bags. . ."

Page 81 - Date of Start-up - Revise to read, ". . . spent fixer commenced in 1973".

Page 83 - Unit description - Add the following: "The spent fixer is collected weekly and transported to building 266 (SWMU's #53 and #54) where silver is recovered from the spent solution."

Page 85 - Unit description - Change to read, "building 296" (two instances).

Page 98 - Release controls - Revise to read, "Scrap is collected in static-conducting plastic bags. . ."

Page 109 - Change to read, "This area is now the site of the current Moser nitrator, building 1543." (Note: Another site has magazines.)

Page 115 - When bulk delivery vehicles are being unloaded at the fuel storage area, Supply Department personnel place drip pans under the hose fittings. The drip pans are emptied into the observed drum and this drum is periodically turned into the Property Disposal Office for recycling. The drum has been stenciled with the name of the contents.