



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

N00174.AR.000107
NSWC INDIAN HEAD
5090.3a

JAN 07 1993

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Reply to (3HW52)

Kenneth D. Morin, Director
Environmental Division
Naval Surface Warfare Center
101 Strauss Ave.
Indian Head, Maryland 20640-5035

Dear Mr. Morin:

This is in response to your letter to John Humphries of the RCRA Programs Branch, dated November 13, 1992, regarding additional Solid Waste Management Units (SWMUs) at both the Stump Neck Annex and Indian Head sites.?

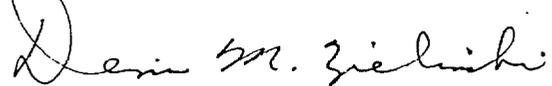
As mentioned in your letter, two additional SWMUs were discovered at the Stump Neck Annex, bringing the total of new SWMUs under investigation to five. We recommend that you submit an addendum to the Verification Investigation workplan to incorporate the five SWMUs. This can be done before you receive EPA's comments on the original Verification Investigation (VI) workplan, which was submitted to EPA in July 1991. EPA has performed a preliminary review and has found extensive comments on the workplan. EPA's final comments on the VI workplan will be sent to you in the next two months. After you review our comments, we would like to schedule a meeting with you, or your appropriate representatives, to discuss the comments in order for a revised document to be prepared.

As to your concern about the Indian Head site, EPA has placed issuance of corrective action permits at a low priority, as we are focusing our efforts towards final cleanup of existing corrective action sites. Also, Indian Head may be a Superfund candidate. If the site is included on the National Priorities List, we will incorporate RCRA concerns into an Interagency Agreement (IAG) which would be negotiated between EPA and the Navy. Otherwise, the additional SWMUs should be addressed in the VI workplan associated with a RCRA Corrective Action Permit.

ENCLOSURE(1) 1/15/93

We appreciate your patience and diligence in striving towards cleanup at these sites. If you are interested in performing stabilization measures at either facility we will be happy to discuss your options. If you have additional concerns, please contact me at (215)597-0320.

Sincerely,



Denis M. Zielinski, Acting Chief
General States Permits Section

cc: E. Hammerberg (MDE)
D. Orenshaw (3HW72)
W. Schremp (3HW52)

7. U.S. EPA publication SW-846 (Test Methods for Evaluating Solid Wastes: Physical/Chemical Methods, 3rd Edition, as updated)
8. U.S. EPA, December 29, 1980, Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans, Office of Monitoring Systems and Quality Assurance, Office of Research and Development, QAMS-005/80.
9. Any future EPA guidance regarding Corrective Measure Studies, Design or Implementation.

G. SOLID WASTE MANAGEMENT UNIT ASSESSMENT

1. The Permittee shall notify the Regional Administrator in writing of the discovery of any SWMU at the Facility, after the date of issuance of this permit, no later than thirty (30) calendar days after the date of discovery. The notification shall include, but not be limited to, the following known information:
 - d. A description of the SWMU's type, function, dates of operation, location (including a map), design criteria, dimensions, materials of construction, capacity, ancillary systems (e.g., piping), release controls, alterations made to the unit, engineering drawings, and all closure and post-closure information available, particularly whether wastes were left in place;
 - e. A description of the composition and quantities of solid wastes processed by the units with emphasis on hazardous wastes and hazardous constituents; and
 - f. A description of any release (or suspected release) of hazardous waste or hazardous constituents originating from the unit. Include information on the date of release, type of hazardous waste or hazardous constituents, quantity released, nature of the release, extent of release migration, and cause of release (e.g., overflow, broken pipe, tank leak, etc.). Also provide any available data which would quantify the nature and extent of environmental contamination, including the results of soil and/or groundwater sampling and analysis efforts. Likewise, submit any existing monitoring information that indicates releases of hazardous waste or hazardous constituents have not occurred or are not occurring. The Permittee may refer to information regarding releases previously submitted to EPA under permit condition I.E., Emergency Response, Interim Measures, Release Reporting.
2. Upon receipt of the notification of any newly-identified SWMU, the Regional Administrator will determine the need for corrective action at such SWMU. If corrective action is necessary to protect human health or the environment, the

Regional Administrator will determine whether a Verification Investigation or RCRA Facility Investigation will be performed and the need for and scope of any Interim Measures.

3. Within sixty (60) calendar days after receipt of the Regional Administrator's determination that a Verification Investigation or RCRA Facility Investigation is necessary, the Permittee shall submit a Verification Investigation Plan or RCRA Facility Investigation Plan meeting the requirements of permit conditions II.B. and II.C. The Regional Administrator's determination shall either specify the media and/or parameters to be investigated or shall require the Permittee to propose and justify the selection of media and/or parameters.
4. Within the time specified in the approved Verification Investigation or RCRA Facility Investigation Plan, which shall not be less than ninety (90) calendar days after receipt of the Regional Administrator's approval of the Plan, the Permittee shall submit the Verification Investigation or RCRA Facility Investigation Report fulfilling the requirements of permit condition II.B. and II.C.
5. In lieu of a Verification Investigation, the Permittee may propose either to incorporate any newly-identified SWMU into an ongoing RCRA Facility Investigation or to submit a proposal for the performance of corrective measures at such newly-identified SWMU in accordance with the provisions of permit condition II.A. Any such proposal shall be submitted to the Regional Administrator along with notification of the discovery of the SWMUs.

H. RECORD KEEPING

Solid waste management units.

Upon completion of closure of any SWMU, the Permittee shall maintain a record of the closure measures taken in the facility operating record.