



DEPARTMENT OF THE NAVY

INDIAN HEAD DIVISION
NAVAL SURFACE WARFARE CENTER
101 STRAUSS AVE
INDIAN HEAD MD 20640-5035

5090
Ser 0951/3
11 Jan 96

Ms. Helene Drago
EPA Region III
841 Chestnut Building
Philadelphia, PA 19107

Dear Ms. Drago:

This is Indian Head Division's sixth monthly progress report as required by the June 2, 1995, Notice of Violation (Docket No. III-FF-CWA-005). The report provides the status of actions being taken to correct lead violations at industrial wastewater outfall (IW) 87, and nitrate esters and total suspended solids violations at IWs 46 and 53.

IW87 - As shown in enclosure (1), the project to remove the lead contamination at this site is on schedule. Step 16, Federal Review of Wetlands Permit, is complete. The Maryland Department of the Environment (MDE) provided notification in enclosure (2) that the Army Corps of Engineers has issued Nationwide Permit #38 for this project. As indicated in enclosure (2), once the Navy submits the final design plans and incorporates the required wetlands protection notes into the construction plans, MDE will issue a Letter of Authorization.

The majority of work in the next few months will be on pre-construction activities that are listed as "RAC Contract Process" on the project schedule. The contractor was on-site in late December to complete some additional lead testing of the soil. This testing was necessary to finalize the required cleanup area so the work plan revision can be completed.

IW46/53 - Progress for the wastewater collection system at IW53 also remains on schedule (see enclosure {3}). Our December letter had reported state approval of the Sediment Erosion Control (SEC) Plan would not be required. However, due to the depth of the wastewater collection tank in the ground, the contractor needs to grade and remove more soil than anticipated. Consequently, over 100 cubic yards of soil will be disturbed, and therefore, the SEC plan will require state review as was originally planned. We will work with MDE to expedite the review so the construction phase can proceed as quickly as possible. Although this will prevent us from

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completing work significantly ahead of schedule, no problems are anticipated meeting our original compliance date.

Please note that we have added colors to enclosures (1) and (3) to differentiate between our original compliance schedule (red lines), the latest schedule estimates (purple lines), and the actual start and finish dates (green lines).

We have also received your December 6, 1995 letter proposing that the Navy consider construction of the IW46 wastewater collection system in FY97. Personnel from our Extrusion Plant and Facilities Planning Divisions are doing additional research on plant capacity and budget data/plans in order to fully address this issue. A report of their analysis and a response to the EPA's proposal will be provided in a separate letter that will be sent to you later this month.

If you have any questions, please contact Mike Dunn on (301) 743-4320.

Sincerely,



SUSAN P. ADAMS
Director, Environmental Division
By direction of the Commander

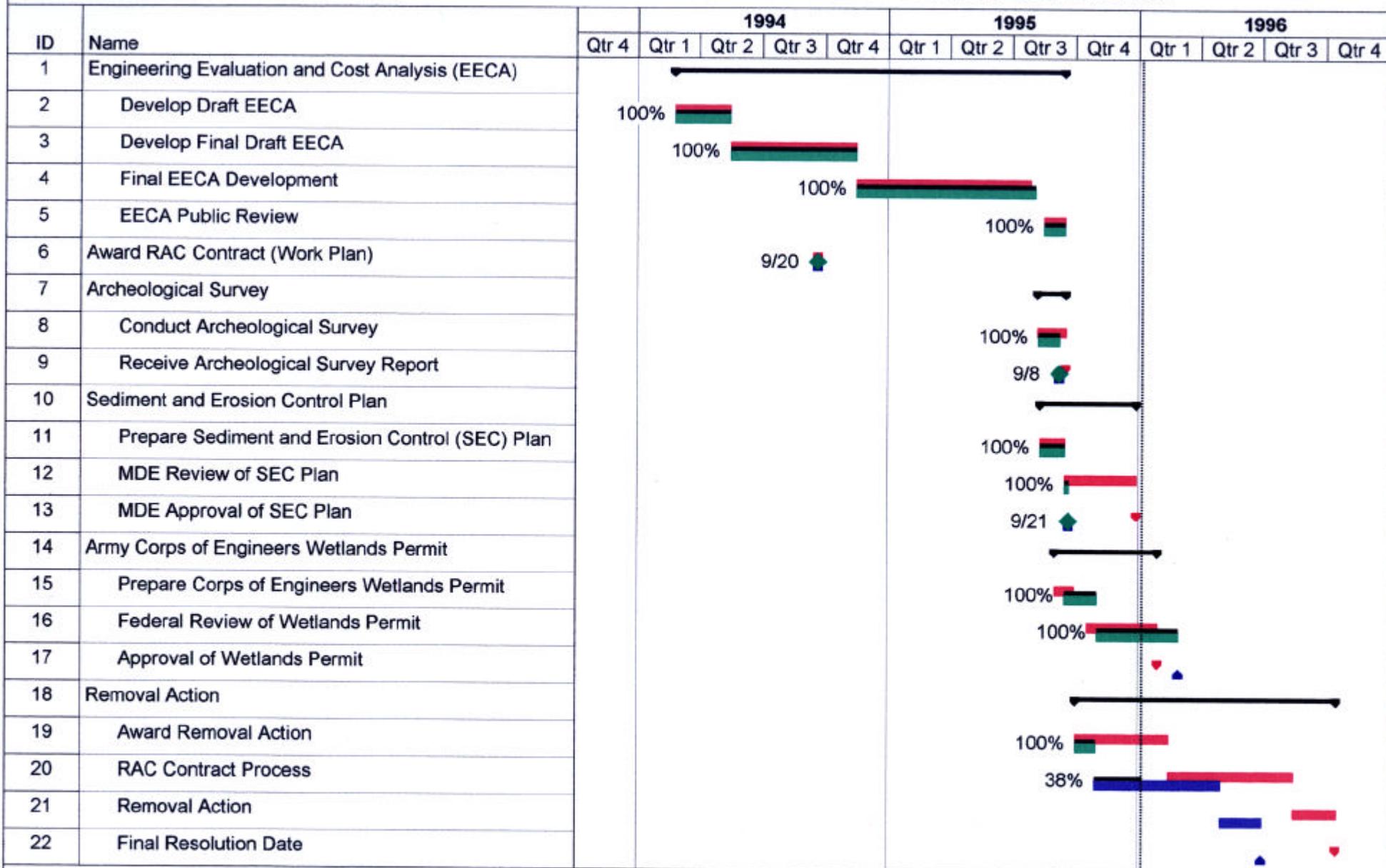
Encl:

- (1) IW87 Compliance Schedule
- (2) December 18, 1995 Letter from MDE
- (3) IW46/53 Compliance Schedule

Copy to:

EPA Region III (P. Yeany)
MDE (C. Coates)
EFACHES (P. Gilbertson)
EFACHES (S. Phillips)
NAVSEASYS COM (SEA07E)
COMNAVBASE Norfolk (N9E3)
NSWC (NSWC 04V)

Plan for Cleanup of Lead Contamination at PDES Industrial Wastewater Outfall IW 87



Project: Date: 1/5/96	Planned █ Scheduled █ Completed █	Planned Milestone ▼ Scheduled Milestone ▲ Completed Milestone ◆	Summary ————— Progress —————
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ENCLOSURE (/



MARYLAND DEPARTMENT OF THE ENVIRONMENT
2500 Broening Highway • Baltimore, Maryland 21224
(410) 631-3000

Parris N. Glendening
Governor

Maryland Department of the Environment
Water Management Administration
Nontidal Wetlands and Waterways Division
Tawes State Office Building E2
580 Taylor Avenue • Annapolis, MD 21401
ANNAPOLIS ANNEX • (410) 974-3841

Jane T. Nishida
Secretary

December 18, 1995

Mr. Jeff Bossart
Indian Head NSWC
101 Strauss Avenue
Indian Head, MD 20640

Application Tracking Number: 199660567
Nontidal Wetlands Number: 95-NT-1189
Project: Soil Remediation, Site 56,
Charles County
Contact Person: Judy Cole (410)974-3841

Dear Mr. Bossart:

The Nontidal Wetlands and Waterways Division of the Water Management Administration in the Maryland Department of the Environment, in coordination with the U.S. Army Corps of Engineers, has reviewed your application for an activity in a nontidal wetland or buffer, 100-year floodplain, and/or regulated waterway. The Corps has notified us that they have issued a Nationwide Permit # 38, which includes WQC, for your proposed project. Therefore the Division is pleased to inform you that we will issue a Letter of Authorization as soon as we receive the following

1. Two complete copies of the final engineering design plans that clearly show the wetland and buffer boundaries and the limits of disturbance.
2. The following conditions listed below must be included on the construction plans under the heading of "Best Management Practices for Working in Nontidal Wetlands". Please note in sequence of construction when these conditions are to be followed.

BEST MANAGEMENT PRACTICES FOR WORKING IN NONTIDAL WETLANDS

- 1) No excess fill, construction material, or debris are to be stockpiled or stored in the wetlands or buffer.

- 2) Place materials in a location and manner which does not adversely impact surface or subsurface water flow into or out of the nontidal wetland.
 - 3) Do not use the excavated material as backfill if it contains waste metal products, unsightly debris, toxic material or any other deleterious substance. If additional backfill is required, use clean material free of waste metal products, unsightly debris, toxic material or any other deleterious substance.
 - 4) Place heavy equipment on mats or suitably operate the equipment to prevent damage to the nontidal wetlands or buffer.
 - 5) Repair and maintain any serviceable structure or fill so there is no permanent loss of nontidal wetlands in excess of nontidal wetlands lost under the original structure or fill.
 - 6) Rectify any nontidal wetlands temporarily impacted by any construction.
 - 7) All stabilization in the wetland and buffer shall be of the following recommended species: Annual Ryegrass (Lolium multiflorum), Millet (Setaria italica), Barley (Hordeum sp.), Oats (Uniola sp.), and/or Rye (Secale cereale). These species will allow for the stabilization of the site while also allowing for the voluntary revegetation of natural wetland species. Other non-persistent vegetation may be acceptable, but must be approved by the Division. **Kentucky 31 fescue shall not be utilized in the wetland or buffer areas.** The area should be seeded and mulched to reduce erosion after construction activities have been completed.
 - 8) After installation has been completed, make post construction grades and elevations of nontidal wetlands the same as the original grades and elevations in temporarily impacted areas.
 - 9) To protect important aquatic species, in-stream work is prohibited as determined by the classification of the stream as follows: Class I waters- in stream work may not be conducted during the period of March 1 through June 15, inclusive, during any year.
3. The name, title, and address of the person who will be legally responsible for compliance with the plan.

As soon as this information is received, your LOA will be promptly issued. Please note that if the Division does not hear from you within 120 days from the date of this letter, we will suspend processing of your application and return your application to you. Should you desire to reapply in the future, you must resubmit the application, referencing all previous tracking numbers, with five copies of all pertinent information to the Permit Service Center.

Wastewater Collection System for Annealing Ovens

ID	Name	Qtr 4	1994				1995				1996			
			Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4
1	Original Design	100%												
2	Safety Redesign													
3	Construction Bid/Award													
4	Develop & Permit Erosion Plans													
5	IW53 Construction													
6	Final Inspection and Startup													
7	Final Resolution at IW53													
8	Decommission Annealing Ovens at IW46													

Project:
Date: 1/5/96

Planned



Planned Milestone



Summary



Scheduled



Scheduled Milestone



Progress



Completed



Completed Milestone



ENCLOSURE (5)

The Water Management Administration has established a Permits Service Center to track both State and federal applications for activities in wetlands and waterways. Should you have any questions regarding the status of your application, you may call our Permits Service Center at 1-800-876-0200 (toll free) between the hours of 8:30 am and 4:30 pm Monday through Friday. Please have your application tracking number available when you call.

Sincerely,

Judy B. Cole

Judy B. Cole
Project Manager
Nontidal Wetlands and Waterways Division

cc: U.S. Army Corps of Engineers - Phil Cwiek