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NSWC INDIAN HEAD
5090.3a

LETTER FROM U S NAVY REGARDING SUBMISSION OF PCR FOR PRELIMINARY
ASSESSMENT AND INVESTIGATION OF SITE 52 NSWC INDIAN HEAD MD
3/28/1989
NSWC INDIAN HEAD

509



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

IN REPLY REFER TO

5090
Ser 043C/23

28 MAR 1989

From: Commanding Officer, Naval Ordnance Station,
Indian Head, MD 20640-5000

To: Commander, Chesapeake Division, Naval Facilities
Engineering Command, Building 212, Washington Navy
Yard, Washington, DC 20734-2121

Subj: SUBMISSION OF PCR FOR PRELIMINARY ASSESSMENT/SITE
INVESTIGATION OF BUILDING 102 MERCURY CONTAMINATION

Ref: (a) PHONCON CHESDIV S. Markert (Code 114)/NAVORDSTA
(Code 043) P. Ritzcovan of 14 Mar 89
(b) 40 CFR 302 Table 2

Encl: (1) 0431 Memo, 5090, Ser 0431/168/mkf of 03 Mar 89
(2) 0431 Memo, 5090, Ser 0431/177/mkf of 08 Mar 89
(3) PCR Submission

1. As discussed during reference (a) during a joint CHESDIV/NAVORDSTA on-site investigation to identify sources which may be contributing to the elevated mercury levels in our sanitary sewage sludge, a pool of mercury was observed in a manhole located near building 102. To the extent possible, all wastes including the mercury, have been extracted from the manhole. These wastes have been containerized and are currently stored in our permitted hazardous waste storage building. Enclosures (1) and (2) are the plans and guidelines followed during clean up operations. The amount of mercury found in the manhole is estimated to exceed one pound which, as per reference (a), is the Comprehensive Environmental Response and Comprehensive Liability (CERCLA) Act reportable quantity.
2. Building 102 is the only building which discharges to this manhole. Upon discovery of the mercury, all wastewater discharges from building 102 were stopped; however, water continues to flow into the manhole from groundwater infiltration. In order to preclude the discharge of mercury into the sewage treatment plant, a temporary trough which conveys groundwater infiltration water into and out of the manhole was installed. As a contingency measure, a mercury trap was installed at the discharge end of the trough. Additionally, a temporary sandbag weir was placed in the manhole to which the building 102 manhole discharges.
3. The source of the mercury is unknown; preliminary investigations indicate that this mercury is not the result of current operations. Building 102 was constructed in 1909

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as a laboratory for the testing of nitrocellulose by the nitrometer method. The nitrometer contains approximately 53 pounds of mercury. The original laboratory was constructed with wood tongue and groove flooring. This flooring was placed on diagonally laid wood subflooring with a layer of asbestos sheeting as a fire retardant.

4. The wood flooring is not impervious and it is possible that mercury spills may have occurred in the laboratory over the years. These spills may have entered the wooden flooring. Additionally, until the 1970's, mercury was not handled as a hazardous material and may have been poured into sinks and drains. The present wastewater discharge lines were installed in the mid-1940's. Little information is available on an overview basis, which addresses how wastewaters were previously discharged from building 102. However, we believe that this information may be gathered during the records search portion of a Preliminary Assessment.

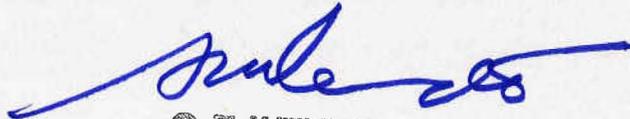
5. In the early 1960's, a two-inch layer of cement was poured over the wooden flooring to seal it. The basement beneath the original location of the nitrometer was converted into office space. In late 1987, mercury was discovered on a countertop in the basement office. The source of the mercury was determined to be the wooden flooring from the laboratory above. The office area was closed and stop-gap remedial measures were taken. Subsequent to this action, mercury droplets were again identified in the basement area.

6. A DAP/MIS project has been prepared and is being forwarded under separate cover which addresses the elimination of the health hazard associated with building 102. Enclosure (3) is submitted as a request for assistance in conducting a Preliminary Assessment/Site Investigation of the building 102 manhole and the wastewater lines associated with this manhole under the Navy Installation Restoration Program.

7. We have given the State of Maryland, Department of the Environment, a telephone briefing on the identification of the mercury, cleanup actions taken to date, and our intent to include this site in our Installation Restoration Program.

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8. We request a Preliminary Assessment be programmed and initiated as soon as possible. If you need further information, please contact Peter Ritzcovan on auto von 364-4210/4534.



G. F. WENDT

Copy to:
NAVSEASYS COM (SEA-6541E)