



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

IN REPLY REFER TO  
5090  
Ser SCE/140  
6 December 1984

Mr. Ronald Nelson, Director  
Waste Management Administration  
Department of Health and Mental Hygiene  
201 West Preston Street  
Baltimore, Maryland 21201

Dear Mr. Nelson:

We are in receipt of your letter of 27 November 1984 concerning the Complaint and Order, C-0-85-165, for the mercury release at Bldg 766, Naval Ordnance Station (NAVORDSTA), Indian Head, MD. The following is a discussion of the steps being taken by the Navy to comply with each item ordered by the subject Complaint and Order.

Requirement 1: "Immediately, cease and desist all discharges of mercury into the environment."

NAVORDSTA Action: Special procedural precautions have been taken for the past several years to prevent mercury from being accidentally discharged. Discharges were stopped on 25 April 1984 and since 11 May 1984, the floor drain in Bldg 766 has been plugged to prevent any accidental discharges from leaving the building. The spill event of 3 August 1984 was a one time, accidental discharge of mercury caused by a construction contractor breaking an old line. No mercury has been discharged since that time.

Requirement 2: "Determine the level of mercury contamination remaining in the soil caused by this specific release and by past disposal practices."

NAVORDSTA Action: Excavation of contaminated soil began on 17 October 1984 and continued for approximately three weeks. The excavated material was placed in 55 gallon drums and is being stored at our hazardous waste storage area. This excavation is at the site of the spill of 3 August 1984. Soil samples taken from the excavation are presently being analyzed by a contractor, Versar, Incorporated. The level of mercury contamination from past disposal practices is the subject of a Navy Assessment and Control of Installation Pollutants (NACIP) Confirmation Study. This NACIP Confirmation Study has verified that some contamination of the natural drainage way from Bldg 766 exists. The Confirmation Study is currently characterizing the extent of that

contamination. The Confirmation Study is expected to be completed by 31 March 1985. A copy of the Confirmation Study will be forwarded to the Waste Management Administration upon its completion.

Requirement 3: "Initiate further removal of mercury contaminated soil until the naturally occurring background concentration levels have been reached or there are no detectable levels of mercury contamination in the soil."

NAVORDSTA Action: Soil in the immediate vicinity of the spill was considered contaminated and has been removed. Samples of the remaining soil are being analyzed by Versar, Incorporated. Background levels are currently being determined to define how much contaminated soil remains at the site. Cleanup efforts will continue as soon as a background level is established.

Requirement 4: "Provide the Waste Management Administration with result of analyses of samples taken from the adjacent natural drainage way and connecting tidal wetlands as part of the ongoing confirmation study of the Initial Assessment Study of Naval Ordnance Station, Indian Head, Maryland."

NAVORDSTA Action: The NACIP Confirmation Study is currently characterizing the extent of contamination of the natural drainage way from Bldg 766 to the connecting tidal wetlands. The study is expected to be completed by 31 March 1984. A copy of the NACIP Confirmation Study will be forwarded to the Waste Management Administration upon its completion.

Requirement 5: "Conduct studies on receiving water bottom sediments to determine if any mercury contamination is present (with EPA approved methods)."

NAVORDSTA Action: The NACIP Confirmation Study is characterizing the full extent of mercury contamination emanating from Bldg 766.

By copy of this letter to Mr. William F. Clark, Chief Hearing Officer, Office of Hearings and Regulations, we request a hearing at a later date concerning the subject Complaint and Order.

Please be assured that the Navy is extremely concerned with environmental protection and public health and welfare. Our point of contact is Mr. Thomas Woo at (301) 743-4320.

Sincerely,



JAMES D. TADLOCK  
Captain, USN  
Commanding Officer.

Copy to:

Mr. William F. Clark, Chief Hearing Officer, Office of Hearings and Regulations, Room 104, 300 West Preston Street, Baltimore, MD 21201  
Commanding Officer, Chesapeake Division, Naval Facilities Engineering Command, Bldg 212, Washington Navy Yard, Washington, DC 20374-2121

COMNAVSEASYS COM (SEA-641)