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NSWC INDIAN HEAD
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LETTER AND ENCLOSURE FROM U S EPA REGION II REGARDING COMPLIANCE WITH
CERCLA SECTION 120 NSWC INDIAN HEAD MD
9/1/1988
U S EPA REGION II



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

FRED COX
ENVIR. EMG. RESPONSE COR.
INDIAN HEAD
STRAUSS AVENUE
0964
INDIAN HEAD, MD 20640-5000

Re: NAVAL ORDINANCE STATION INDIAN HEAD Compliance with CERCLA Section 120

Dear MR. COX:

As I am sure you are aware, your facility has been listed on the Federal Agency Hazardous Waste Compliance Docket (the docket) as of 02/12/88 in accordance with the requirements of Section 120 of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA). EPA requires that all such facilities must submit to EPA a preliminary assessment (PA) within 18 months of being listed on the docket. The PA must provide data that will sufficiently allow EPA to evaluate the facility with the Hazard Ranking System (HRS) for potential listing on the National Priorities List (NPL).

To date, EPA has the following documents for your facility to support the PA requirement:

- . A.T. Kearney, Inc., August 1988, Phase II - RCRA Facility Assessment of the Naval Ordinance Station, Indian Head, Maryland.
- . Aware Corporation, April 23, 1982, Portable Water Improvement Study Naval Ordinance Station.
- . CH2MHill, September 1985, NACIP Confirmation Study, Naval Ordinance Station Indian Head, Maryland.
- . Ecology and Environment, May 25, 1982, A Preliminary Assessment of Naval Ordinance Station.
- . Fred C. Hart Associates, Inc., May 1983, Initial Assessment Study, Naval Ordinance Station, Indian Head, Maryland.
- . February 25, 1988, Preliminary Assessment.
- . September 30, 1985, Site Inspection.

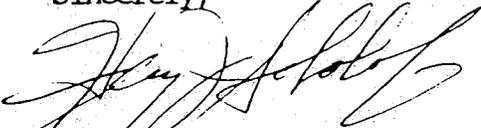
EPA has reviewed all of the above documents in view of the data requirements of the revised HRS (55 FR 51532), but has determined that some data provided by the documents are deficient. Enclosed is an HRS scoring checklist that indicates which areas are deficient and therefore need to be addressed.

Although EPA Region III recognizes that the HRS is new and complex for many users, the statutory deadlines of CERCLA still must be met. In fact, EPA is currently under a court order to evaluate the docket facilities as a result of a recent lawsuit by the Conservation Law Foundation.

To assist facilities in preparing the PAs, EPA Region III is conducting a 2-day conference in Annapolis, Maryland on June 19 through 20, 1991. The first day of the conference will include in-depth discussion on the new HRS as it relates to federal facilities. A draft agenda is enclosed. You should have already received a formal invitation to the conference. By sending this followup letter, it is our hope that technical representatives from your facility (those directly responsible for preparing the PA) will attend at least the 1-day HRS session and come prepared to discuss the unique characteristics of your facility. EPA has designed the session so that we can answer some of the specific questions that relate to your facility.

As always, if you have any technical questions regarding the enclosed material, please call Ms. Lisa Cunningham at (215) 597-0984.

Sincerely,



Henry J. Sokolowski
Chief, Federal Facilities Section

cc: SHERRY MCCAHILL, MATERIALS BRANCH MANAGER, NAVAL ORDNANCE STATION, 0965

Enclosures

- . Deficiency checklist
- . Draft agenda

HRS SCORING DEFICIENCY CHECKLIST

EPA ID # MD7170024684
 Federal Facility ID # MD-170024109
 Facility Name NAVAL ORDNANCE STATION INDIAN HEAD

City INDIAN HEAD State MD Zip 20640

INFORMATION IS PROVIDED? ACCEPTABLE?

Y/N Y/N*

1. OVERVIEW/SITE HISTORY

- 1A. Reports submitted to EPA are referenced and copies of each reference are provided. N
- 1B. Describe facility operations (manufacturing, storage, waste disposal practices, etc.) including the following: N
 - 1B1. History of the facility and sources (any area containing or potentially containing hazardous substances). Y
 - 1B2. A topographic map with a 4-mile radius drawn around each source. N
 - 1B3. A facility and source location map and sketch. Y
 - 1B4. Regulatory history of the facility (e.g., RCRA facility, TSCA, CERCLA, NPDES permits, etc.). Y
- 1C. Describe any emergency response actions or interim remedial actions that have occurred at the facility. Description should include amount of materials removed, disposal location, and sample analytical results prior and subsequent to removal. Y
- 1D. Describe any release of hazardous substances, pollutants, or contaminants to ground water, surface water, soil, or air and provide sampling results with detection limits, laboratory methods, and quality assurance procedures. Y
- 1E. Give the following population within each radius indicated below. Each radius should begin at the center of each source if the source is small or at the outer edge if the source is large. Count population in overlapping areas only once. N
 - 1E1. 0 - 1/4 mile ---
 - 1E2. 1/4 - 1/2 mile ---
 - 1E3. 1/2 - 1 mile ---
 - 1E4. 1 - 2 mile ---
 - 1E5. 2 - 3 mile ---
 - 1E6. 3 - 4 mile ---

* Where information is provided but not acceptable, see attachment for a detailed explanation of why the information is not acceptable.

HRS SCORING DEFICIENCY CHECKLIST

Facility Name NAVAL ORDNANCE STATION INDIAN HEAD

		INFORMATION IS PROVIDED? ACCEPTABLE?	
		<u>Y/N</u>	<u>Y/N</u> *
1F.	Describe any prior spills (e.g., quantity of the spill, hazardous substances) that occurred at the facility.	<u>Y</u>	<u>Y</u>
1G.	Describe facility and source security and access (e.g., fences, patrols, gates, etc.).	<u>N</u>	<u>---</u>
2.	WASTE/SOURCE INFORMATION (see Section 2 of the HRS Final Rule - December 1990 Federal Register)		
2A.	Describe as specifically as possible the types of wastes produced at the facility and the methods in which these wastes were treated, stored, or disposed.	<u>Y</u>	<u>Y</u>
2B.	Describe as specifically as possible the amount (volume, weight, etc.) of each waste type produced and the form in which it was discharged or disposed (e.g., solid, liquid) at the facility.	<u>Y</u>	<u>Y</u>
2C.	Describe each source type (e.g., landfill) located within the facility boundary.	<u>Y</u>	<u>Y</u>
2D.	Describe as specifically as possible the constituents (concentrations of individual constituents) of each waste type disposed in each source.	<u>Y</u>	<u>Y</u>
2E.	Describe as specifically as possible the amount of waste treated, stored, or disposed of in each source (e.g., landfills, impoundments, tanks).	<u>Y</u>	<u>Y</u>
2F.	Determine the depth at which wastes were deposited in each source.	<u>Y</u>	<u>Y</u>
2G.	Describe as specifically as possible the condition/integrity of each source (e.g., Do landfills have liners or caps?).	<u>Y</u>	<u>Y</u>
2H.	Describe any secondary containment features/structures associated with each source (e.g., precipitation runoff and runoff systems, leachate collection systems, gas collection systems).	<u>N</u>	<u>---</u>
2I.	Describe the size, volume, capacity, and area of each source.	<u>N</u>	<u>---</u>
3.	GROUND-WATER PATHWAY INFORMATION (see Section 3 of the HRS Final Rule - December 1990 Federal Register)		
3A.	Determine if the ground water within a 4-mile radius of each source is used for any of the following purposes and locate the wells on a map. Each radius should begin at the center of each source if the source is small or at the outer edge if it is large. Provide the depth of each well.	<u>Y</u>	<u>N</u>

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HRS SCORING DEFICIENCY CHECKLIST

Facility Name NAVAL ORDNANCE STATION INDIAN HEAD

		INFORMATION IS PROVIDED? ACCEPTABLE?	
		<u>Y/N</u>	<u>Y/N</u> *
3A1.	private or public drinking-water source	<u>Y</u>	<u>N</u>
3A2.	irrigation of commercial food or commercial forage crops (include acres)	<u>N</u>	<u>---</u>
3A3.	commercial livestock watering	<u>N</u>	<u>---</u>
3A4.	commercial aquaculture	<u>N</u>	<u>---</u>
3A5.	water for major or designated recreational area, excluding drinking-water use	<u>N</u>	<u>---</u>
3A6.	standby wells used for drinking water at least once a year	<u>N</u>	<u>---</u>
3B.	Outline the public water distribution system within a 4-mile radius of each source on a topographic map.	<u>N</u>	<u>---</u>
3C.	Identify the nearest drinking-water well within a 4-mile radius of each source.	<u>N</u>	<u>---</u>
3D.	Determine the population (including workers, students, and residents) drawing from each drinking-water well within the following radii. Each radius should start at the center of each source if the source is small, or at the outer edge if it is large. Count population in overlapping areas only once.	<u>N</u>	<u>---</u>
3D1.	0 - 1/4 mile	<u>---</u>	<u>---</u>
3D2.	1/4 - 1/2 mile	<u>---</u>	<u>---</u>
3D3.	1/2 - 1 mile	<u>---</u>	<u>---</u>
3D4.	1 - 2 mile	<u>---</u>	<u>---</u>
3D5.	2 - 3 mile	<u>---</u>	<u>---</u>
3D6.	3 - 4 mile	<u>---</u>	<u>---</u>
<u>3E.</u>	Describe known or probable ground-water flow direction from each source.	<u>Y</u>	<u>Y</u>
<u>3F.</u>	Describe as specifically as possible the geology and hydrogeology of the facility area (including geological formation name, thickness, types of material, hydraulic conductivities, and depth to aquifers); provide references.	<u>Y</u>	<u>Y</u>
<u>3G.</u>	Discuss any evidence of aquitards and discontinuities between aquifers within a 4-mile radius of each source.	<u>Y</u>	<u>Y</u>
<u>3H.</u>	Describe any evidence of interconnections between the uppermost aquifer and lower aquifers within 2 miles of each source.	<u>Y</u>	<u>Y</u>
3I.	Estimate annual net precipitation at the facility.	<u>N</u>	<u>---</u>
<u>3J.</u>	Discuss soil or geologic conditions that might inhibit or facilitate ground-water migration.	<u>Y</u>	<u>Y</u>

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HRS SCORING DEFICIENCY CHECKLIST

Facility Name NAVAL ORDNANCE STATION INDIAN HEAD

INFORMATION IS PROVIDED? ACCEPTABLE?

Y/N Y/N*

3K.	Determine if sources are located in an area of Karst terrain.	<u>Y</u>	<u>Y</u>
3L.	Provide results from ground-water sampling of aquifers underlying the sources and from domestic wells (drinking water) within 2 miles of each source.	<u>N</u>	---
3M.	Provide results from background ground-water sampling of aquifers underlying the sources.	<u>N</u>	---
3N.	Determine if any areas within a 4-mile radius of each source are located in a Wellhead Protection Area according to Section 1428 of the Safe Drinking Water Act.	<u>Y</u>	<u>Y</u>
4.	SURFACE-WATER PATHWAY INFORMATION (see Section 4 of the HRS Final Rule - December 1990 Federal Register)		
4A.	Describe surface-water bodies 0 to 15 miles downstream of each source and provide a map of surface-water bodies receiving drainage from each source.	<u>Y</u>	<u>N</u>
4B.	Discuss the probable surface runoff pattern from each source to surface waters, including the distance to the nearest surface-water body; provide a map.	<u>Y</u>	<u>Y</u>
4C.	Describe the point(s) at each source where hazardous substances begin to migrate and their probable point(s) of entry into a surface-water body (including ponds, lakes, streams, etc.).	<u>Y</u>	<u>Y</u>
4D.	Identify if surface water drawn from intakes within 15 miles downstream of the probable point of entry is used for any of the following purposes:	<u>N</u>	---
	4D1. irrigation (5-acre minimum) of commercial food or commercial forage crops	---	---
	4D2. watering of commercial livestock	---	---
	4D3. ingredient in commercial food preparation	---	---
	4D4. major or designated water recreation area, excluding drinking water	---	---
4E.	Identify the following targets associated with surface-water bodies 0 to 15 miles downstream of the probable point of entry:	<u>N</u>	---
	4E1. population (residents, workers, and students) served by intakes of drinking water	---	---

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HRS SCORING DEFICIENCY CHECKLIST

Facility Name NAVAL ORDNANCE STATION INDIAN HEAD

		INFORMATION IS PROVIDED? ACCEPTABLE?	
		<u>Y/N</u>	<u>Y/N*</u>
4E2.	sensitive environments (see Table 4-23, December 1990 Federal Register) and critical habitats for federally endangered or threatened species	---	---
4E3.	economically important resources (e.g., shellfish)	---	---
4E4.	any portion of the surface water designated by a state for drinking-water use under Section 305(a) of the Clean Water Act; or any portion of surface water usable for drinking water	---	---
4F.	Determine the miles of wetlands (wetland frontage) along surface-water bodies 0 to 15 miles downstream from the probable point of entry (see 40 CFR section 230.3).	<u>N</u>	---
4G.	Provide results from sampling of wetlands and/or sensitive environments 0 to 15 miles downstream of each source.	<u>Y</u>	<u>Y</u>
4H.	Discuss any qualitative, quantitative, or circumstantial evidence of contamination of surface waters from sources.	<u>Y</u>	<u>Y</u>
4I.	Provide results from sediment and surface-water sampling for points 0 to 15 miles downstream of each source.	<u>Y</u>	<u>Y</u>
4J.	Provide results from background sediment and surface-water sampling.	<u>N</u>	---
4K.	Provide results from sampling of surface-water intakes 0 to 15 miles downstream of each source.	<u>N</u>	---
4L.	Estimate the size of the upgradient drainage area for each source.	<u>N</u>	---
4M.	Determine the 2-year, 24-hour rainfall for the site.	<u>N</u>	---
4N.	Discuss the average annual streamflow associated with each surface-water body located 0 to 15 miles downstream of each source.	<u>N</u>	---
4O.	Determine surface soil types at the facility.	<u>Y</u>	<u>Y</u>
4P.	Determine if sources are located in a 1-year, 10-year, 100-year, or 500-year flood plain.	<u>N</u>	---
4Q.	Discuss fisheries (recreational or commercial) in surface-water bodies 0 to 15 miles downstream of each source:	<u>N</u>	---
4Q1.	Describe annual production (in pounds) of human food chain organisms (e.g., trout, shellfish, snapping turtles, crabs) per acre of streams and rivers 0 to 15 miles downstream of each source.	---	---

* Where information is provided but not acceptable, see attachment for a detailed explanation of why the information is not acceptable.

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Facility Name NAVAL ORDNANCE STATION INDIAN HEAD

INFORMATION IS PROVIDED? ACCEPTABLE?

Y/N Y/N*

4Q2.	Describe annual production (in pounds) of human food chain organisms (e.g., trout, shellfish, snapping turtles, crabs) per acre of ponds, lakes, bays, or oceans 0 to 15 miles downstream of each source.	---	---
4R.	Identify closed fisheries 0 to 15 miles downstream of each source.	<u>N</u>	---
4S.	Provide results from sampling of human food chain organism tissues in streams and rivers 0 to 15 miles downstream of each source and in ponds, lakes, and bays that receive drainage from the sources.	<u>N</u>	---
5.	AIR PATHWAY INFORMATION (see Section 6 of the HRS Final Rule - December 1990 Federal Register)		
5A.	Describe if there has been an observed release (i.e., visual or analytical evidence) of a hazardous substance to the atmosphere.	<u>Y</u>	<u>Y</u>
5B.	Determine the shortest distance to the closest residence or regularly occupied building or area from any on-site source.	<u>N</u>	---
5C.	Determine if any of the following resources are located within a 1/2-mile radius of each source	<u>N</u>	---
5C1.	commercial agriculture	---	---
5C2.	commercial silviculture	---	---
5C3.	major or designated recreation area	---	---
5D.	Determine if sensitive environments are within a 4-mile radius of each source.	<u>Y</u>	<u>Y</u>
5E.	Determine the total area of wetlands within a 4-mile radius of each source.	<u>N</u>	---
6.	SOIL-EXPOSURE PATHWAY INFORMATION (see Section 5 of the HRS Final Rule - December 1990 Federal Register)		
6A.	Describe any areas of contamination that are within 2 feet of the ground surface; provide the areal extent of contamination.	<u>Y</u>	<u>Y</u>
6B.	Provide locations and depths of soil samples and results.	<u>Y</u>	<u>Y</u>
6C.	Provide results of background soil sampling.	<u>N</u>	---

* Where information is provided but not acceptable, see attachment for a detailed explanation of why the information is not acceptable.

HRS SCORING DEFICIENCY CHECKLIST

Facility Name NAVAL ORDNANCE STATION INDIAN HEAD

	INFORMATION IS PROVIDED? ACCEPTABLE?	
	<u>Y/N</u>	<u>Y/N</u> *
6D. Describe the measures taken to limit access to areas with soil contamination within 2 feet of the surface (e.g., fences, security guards).	<u>N</u>	<u>---</u>
6E. Determine if any of the following are located near or within an area of soil contamination (within 2 feet of the surface); provide the number of individuals for 6E1 and 6E2:	<u>N</u>	<u>---</u>
6E1. within 200 feet of any residences, schools, or day care centers and within the property boundary	<u>---</u>	<u>---</u>
6E2. within 200 feet of the work place area and within a work place property boundary	<u>---</u>	<u>---</u>
6E3. within boundaries of commercial agriculture, silviculture, livestock production, or grazing area	<u>---</u>	<u>---</u>
6E4. within boundaries of a terrestrial-sensitive environment (see Table 5-5, December 1990 Federal Register)	<u>---</u>	<u>---</u>
6F. Determine the number of individuals who live, work, or attend school within the following distances of soil contamination (within 2 feet of the surface).	<u>N</u>	<u>---</u>
6F1. 0 - 1/4 mile radius	<u>---</u>	<u>---</u>
6F2. 1/4 - 1/2 mile radius	<u>---</u>	<u>---</u>
6F3. 1/2 - 1 mile radius	<u>---</u>	<u>---</u>

* Where information is provided but not acceptable, see attachment for a detailed explanation of why the information is not acceptable.

HRS Scoring Deficiency Checklist Attachment

Naval Ordnance Station Indian Head (Indian Head, MD)

The sources of information EPA reviewed to complete the attached deficiency checklist are provided in the cover letter.

In cases where information was provided to EPA but is not acceptable, EPA has provided an explanation below. The number and letter adjacent to the explanation correspond to the number and letter that appear on the HRS Scoring Deficiency Checklist.

- 3A. - Provide the locations of wells within a 4-mile radius of each source, on a topographic map.
 - 3A1. - Provide the locations of private and public drinking-water wells within a 4-mile radius of each source, on a topographic map.
 - 4A. - Provide a map of surface-water bodies 0- to 15-miles downstream of each source.
-