

N00174.AR.000596  
NSWC INDIAN HEAD  
5090.3a

LETTER FROM U S NAVY REGARDING OBSERVATIONS AND ACTIONS PERFORMED IN  
RESPONSE TO THE 16 MAY 1991 AND 20 MAY 1991 RESOURCE CONSERVATION AND  
RECOVERY ACT INSPECTION NSWC INDIAN HEAD MD  
6/16/1991  
NSWC INDIAN HEAD



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

5090  
Ser 0965/356  
13 Jun 91

Maryland Department of the Environment  
Hazardous Waste Enforcement Division  
Attn: Mr. Mansoor Zakai  
2500 Broening Highway  
Baltimore, MD 21224

Gentlemen:

On May 16 and 20, 1991, you performed a RCRA inspection of our facility. As a result of this inspection, a Report of Observations was completed and signed on May 24, 1991. We have reviewed the inspection observations and initiated action on them.

Enclosed is a list of the observations and our actions to date on these observations.

If you have any questions or require additional information, please contact Ms. Sherry McCahill on (301) 743-6745/46.

Sincerely,

KENNETH D. MORIN, P.E.  
Director, Utilities/  
Environmental Division  
By direction of  
the Commanding Officer

Encl:

- (1) May 16 & 20 MDE RCRA  
Inspection Observations/  
Corrective Actions

Copy to:

Maryland Department of the  
Environment (E. Hammerberg)  
NAVSEASYS COM (SEA 654E)  
CHESNAVFACENGC COM (Code 114)





DEPARTMENT OF THE NAVY

NAVAL ORDNANCE STATION

**MAY 16 & 20 MDE RCRA INSPECTION  
OBSERVATIONS/CORRECTIVE ACTIONS**

1. **Observation:** Inspection results for building 455 were not properly documented as required by Attachment Number 3 of NAVORDSTA's RCRA permit.

**Corrective action:** An inspection check list was sent to Code 1132, Mr. Robert Steves, who operates building 455, our permitted storage facility. This check list was forwarded under memo Ser 0965/129/gds dated June 10, 1991.

2. **Observation:** Building 455 had waste in excess of the 3,850 permit limit stored in Bay #5.

**Corrective action:** On April 9, 1991, we notified Mansoor Zakai of the MDE of our storage of spent fixer over the bay limits due to silver recovery efforts. To our knowledge, this exceedence was temporarily approved by Mansoor Zakai.

However, to correct this situation, we have moved the excess spent fixer into diked Bay #6 where spill response equipment is stored. Mr. Zakai was notified on June 4, 1991 of our intent to move the waste to bay #6. He stated that he saw no problems with this move. The spent fixer was moved on June 10, 1991.

3. **Observation:** Inspection results for building 1440 were not properly documented as required by Attachment Number 3 of NAVORDSTA's RCRA permit.

**Corrective action:** An inspection check list was sent to Code 1132, Mr. Robert Steves, who operates building 455, our permitted storage facility. This check list was forwarded under memo Ser 0965/129/gds dated June 10, 1991.

4. **Observation:** Two drums of hazardous waste stored at building 292 were over 90 days old.

**Corrective action:** Both of these drums were moved into building 455 on May 24, 1991.

5. **Observation:** Hazardous waste over 90 days old was being accumulated at the Auxiliary Thermal Treatment Point (ATTP).

**Corrective action:** Because this waste is explosively contaminated, it must be thermally treated prior to transport to storage at building 455 or disposal off-site. Although we have developed a schedule to treat this waste, it has been moved to building 721 until it can be treated. This schedule is detailed in Naval Ordnance Station letter 5090 Ser 0965/355 of June 10, 1991, which was given to Mr. Zakai on June 10, 1991.

**ENCLOSURE**

**MAY 16 & 20 MDE RCRA INSPECTION  
OBSERVATIONS/CORRECTIVE ACTIONS**

**6. Observation:** Hazardous waste was being accumulated at the ATPP which was considered non-secure.

**Corrective action:** All of the hazardous waste that was being accumulated at the ATPP was moved into a fenced area at building 721.