

FINAL
ENVIRONMENTAL COMPLIANCE ASSESSMENT REPORT

DEFENSE NATIONAL STOCKPILE CENTER
DNSC-NEW HAVEN
NEW HAVEN, INDIANA

Prepared for

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LIST OF ACRONYMS

AST	Aboveground Storage Tank
BNA	Bureau of National Affairs
CEHNC	U.S. Army Engineering and Support Center, Huntsville
CESQG	Conditionally Exempt Small Quantity Generator
DLA	Defense Logistics Agency
DLAM	Defense Logistics Agency Manual
DNHC	Defense National Stockpile Center
DoD	Department of Defense
DOT	Department of Transportation
ECA	Environmental Compliance Assessment
EPCRA	Emergency Planning and Community Right-to-Know Act
H&S	Health and Safety
IRP	Installation Restoration Program
MP	Management Practice
MSDS	Material Safety Data Sheet
NEPA	National Environmental Policy Act
NFPA	National Fire Protection Association
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
OSHA	Occupational Safety and Health Administration
PCB	Polychlorinated Biphenyl
POL	Petroleum, Oil, and Lubricant
RCS	Report Control Symbol
SOW	Statement of Work
SPCC	Spill Prevention, Control, and Countermeasures (Plan)
SWP3	Storm Water Pollution Prevention Plan
TEAM	The Environmental Assessment and Management (Guide)
USACERL	U.S. Army Construction Engineering Research Laboratories
USDA	U.S. Department of Agriculture
UST	Underground Storage Tank

1.0 EXECUTIVE SUMMARY

1.0.0.0.1 The U.S. Army Construction Engineering Research Laboratories (USACERL), in cooperation with Department of Defense (DoD) components, including the Defense Logistics Agency (DLA), developed The Environmental Assessment and Management (TEAM) Guide to evaluate compliance with Federal, state, and local environmental regulatory statutes and programs, and to identify solutions for existing or potential problems.

1.0.0.0.2 The overall mission is to improve DLA compliance with applicable environmental regulations, reduce the number of compliance deficiencies, and subsequently reduce the number of Notices of Violations (NOVs) from regulatory agencies. Results of the assessment help the facility address immediate problems and allocate resources for correction of long-term issues.

1.0.0.0.3 An Environmental Compliance Assessment (ECA) was conducted at the DLA's Defense National Stockpile Center (DNNSC)-New Haven facility on 22 March 2001 by three personnel from Harding ESE, Inc., under contract to the U.S. Army Engineering and Support Center, Huntsville (CEHNC). The following documents were used to assess compliance:

- The TEAM Guide, September 2000;
- The Indiana Supplement to the TEAM Guide, June 2000;
- The DLA Supplement to the TEAM Guide, November 1994;
- Indiana regulations, prepared by The Bureau of National Affairs, Inc. (BNA), 2001.

1.0.0.0.4 For this ECA, thirteen protocol areas were reviewed, including: Air Emissions Management; Cultural Resources

Management; Hazardous Materials Management; Hazardous Waste Management; Natural Resources Management; Other Environmental Issues [National Environmental Policy Act (NEPA) process, Environmental Noise, Installation Restoration Program (IRP), Pollution Prevention, and Program Management]; Pesticide Management; Petroleum, Oil, and Lubricant (POL) Management; Solid Waste Management; Storage Tanks Management; Toxic Substances Management [polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint]; Wastewater Management; and Water Quality Management (e.g., potable water).

1.0.0.0.5 Compliance was assessed using protocol statements based on applicable Federal, state, and local regulations, DLA regulations, and DoD Directives. A non-compliant protocol statement was noted by means of a negative finding sheet.

1.0.0.0.6 A particular practice or procedure which exceeds the requirement is noted through a positive finding sheet.

1.0.0.0.7 The ECA finding categories are based on the nature of the non-compliance and are described below:

- Class I: Noncompliance with an existing environmental regulation, compliance agreement, consent order, or operating/discharge permit. These may stem from Federal, state, or local requirements.
- Class II: Noncompliance with a future deadline in an environmental regulation, compliance agreement, or consent order. These may stem from Federal, state, or local requirements.
- Class III: Findings based on DLA regulations, DoD Directives, and management practices (MP).

- Health and Safety (H&S): Findings based on Occupational Safety and Health Administration (OSHA), U.S. Department of Transportation (DOT), and National Fire Protection Association (NFPA) as indicated in requirements column in the ECA protocol. H&S findings may be regulatory but are not part of the Report Control Symbol (RCS) 1383 reporting process and not eligible for environmental funding. H&S findings are not classified Class I, II, or III.
- Significant Finding: A finding sub-categorized as significant requires immediate attention. It poses, or has high likelihood to pose, a direct and immediate threat to human health, safety, environment, or the mission.

1.0.0.0.8 Per the Statement of Work (SOW), this report contains only information concerning Class I regulatory findings.

1.0.0.0.9 Information on Class II, III, and H&S findings has been compiled as an addendum to the ECA report, and this addendum has been submitted directly to the Depot Manager. The addendum is not considered a part of the Draft ECA Report.

1.0.0.0.10 Class I findings were found in 3 of the 13 protocol sections and include: Emergency Planning and Community Right-to-Know Act (EPCRA) hazardous material inventory not completed; Spill Prevention, Control, and Countermeasures Plan (SPCCP) not updated to reflect changes; and Storm Water Pollution Prevention Plan (SWP3) annual compliance evaluation not completed.

1.0.0.0.11 Per the SOW, Class II, III, and H&S findings are not included in the report.

1.0.0.0.12 A summary of the number of findings in each protocol category is presented in Table 1-1.

1.0.0.0.13 The point of contact for the assessment is provided in Table 2-1.

1.0.0.0.14 Table 4-1 presents a summary of the findings by protocol area, including the category, criteria, condition, and status of corrective action of each finding.

1.0.0.0.15 Detailed finding sheets are presented in Section 6.0.

1.0.0.0.16 A list of references is included in Section 7.0.

Table 1-1. Summary of Findings

	I	II	III	H/S	III Positive
I Air Emissions Management	0				
II Cultural Resources Management	0				
III Hazardous Materials Management	1				
IV Hazardous Waste Management	0				
V Natural Resources Management	0				
VI Other Environmental Issues					
Environmental Impacts	0				
Environmental Noise	0				
Installation Restoration Program	0				
Pollution Prevention	0				
Program Management	0				
VII Pesticide Management	0				
VIII Petroleum, Oil, and Lubricant (POL) Management	1				
IX Solid Waste Management	0				
X Storage Tanks Management	0				
XI Toxic Substances Management					
Polychlorinated Biphenyls (PCBs)	0				
Asbestos	0				
Radon	0				
Lead-Based Paint	0				
XII Wastewater Management	1				
XIII Water Quality Management	0				
TOTALS	3				

Class II, III, H&S
findings are not included
in this report

2.0 BACKGROUND AND SCOPE

2.0.0.0.1 The following sections describe the background and scope for the ECA and the procedures used to evaluate regulatory compliance at the DNSC-New Haven facility.

2.1 Background

2.1.0.0.1 The DLA developed the ECA to evaluate their compliance with environmental regulatory statutes and programs, and to identify solutions for existing or potential problems. The results of the assessment will help the facility address immediate problems and allocate resources for correction of long-term issues. The overall mission of this assessment is to improve DLA compliance with environmental regulations, reduce the number of compliance deficiencies and, subsequently, reduce the number of NOV's from regulatory agencies.

2.1.0.0.2 Under contract to CEHNC, Harding ESE conducted an independent ECA of the DLA's DNSC-New Haven facility to assess regulatory compliance with applicable Federal, state, and local environmental regulations for 13 compliance protocols. The assessment was performed by three Harding ESE personnel on 22 March 2001. The following documents were used to assess compliance:

- The TEAM Guide, September 2000;
- The Indiana Supplement to the Team Guide, June 2000;
- The DLA Supplement to the Team Guide, November 1994;
- Indiana regulations, prepared by BNA, 2001.

2.1.0.0.3 The following 13 compliance protocols were assessed by Harding ESE personnel:

- 1 Air Emissions Management;
- 2 Cultural Resources Management;
- 3 Hazardous Materials Management;
- 4 Hazardous Waste Management;
- 5 Natural Resources Management;
- 6 Other Environmental Issues:
 - National Environmental Policy Act (NEPA) process,
 - Environmental Noise,
 - Installation Restoration Program (IRP),
 - Program Management, and
 - Pollution Prevention;
- 7 Pesticide Management;
- 8 Petroleum, Oil, and Lubricant (POL) Management;
- 9 Solid Waste Management;
- 10 Storage Tanks Management;
- 11 Toxic Substances Management:
 - Polychlorinated Biphenyls (PCBs),
 - Asbestos,
 - Radon, and
 - Lead-Based Paint;
- 12 Wastewater Management; and
- 13 Water Quality Management (potable water).

2.2 Scope

2.2.0.0.1 Assessment of DNSC-New Haven facility was accomplished through three separate tasks: Task 1-Preliminary Document Review/ECA Coordination; Task 2-Site Survey; and Task 3-ECA Report.

2.2.0.0.2 Task 1 involved a review of applicable environmental regulations and documents to become acquainted with the installation, a review of applicable documentation, and coordination of the upcoming assessment with DLA headquarters. In addition, state and local protocols were reviewed.

2.2.0.0.3 Task 2 included: an informal in-briefing with onsite personnel; the actual site survey during which onsite personnel were interviewed, records reviewed, and operations assessed for the entire Center; and a formal exit briefing at which a summary of the ECA results was discussed with the DLA Headquarters representative and Center Manager. The DNSC-New Haven point of contact is listed in Table 2-1.

2.2.0.0.4 Any incidence of non-compliance was recorded on a finding sheet. Each finding sheet contains the following information: finding location, protocol area, the type of finding, description of the non-compliant issue, the regulatory requirement in question, and other comments directly related to the finding. All the findings included in this report are ranked as Class I regulatory findings.

Table 2-1. Point of Contact for Various Protocol Categories

Name	Title	Protocol
Fred Brooks	Center Manager	All

3.0 DNSC-NEW HAVEN BACKGROUND

3.0.0.0.1 DNSC-New Haven is located 12 miles east of Fort Wayne, Indiana, and approximately 3 miles east of New Haven, IN, along State Road 14 which marks the southern boundary. DNSC-New Haven's mission is to procure, store, sell, and maintain strategic and critical materials for national defense. The depot is also responsible for five (5) satellite storage facilities located in: Batesville, Arkansas; Camden, Arkansas (2 sites); Pine Bluff, Arkansas; and Sharonville, Ohio.

3.0.0.0.2 DNSC-New Haven is located on Government-owned land and occupies an area of approximately 268 acres of land. A small industrial park lies to the north of the depot, a public park to the east, and farmland to the west. The Center has a combination of outdoors stockpiles of various materials, and storage buildings. There are approximately 30 buildings/warehouses; a number of these buildings are no longer in use.

3.0.0.0.3 Materials stored indoors in buildings/warehouses at the DNSC-New Haven include Antimony, Beryllium, Chromium, Cobalt, Columbium Carbide, Ferrochromium, Fluorspar, Graphite, Lead, Mercury, Mica, Rubber, Tannin, Tantalum Carbide, Tin, Tungsten, and Zinc.

3.0.0.0.4 All commodities in open storage currently located at the Center are subject to environmental compliance. These commodities include: Aluminum Oxide, Ferrochrome, Ferromanganese, Fluorspar, Lead, Tin, and Zinc.

4.0 SUMMARY OF FINDINGS

4.0.0.0.1 This section provides a summary of all Class I (i.e., regulatory findings) observed during the ECA. Table 4-1 addresses each finding by protocol area and cites the regulatory procedure and requirement for the finding. The table describes the condition observed and provides the status of corrective action.

4.0.0.0.2 Individual finding sheets, which provide detailed finding descriptions, are provided in Section 6.0 of this report.

Table 4-1. Environmental Compliance Assessment Findings Summary Table

Finding ID	Protocol Area	Class	Criteria	Condition	Status of Corrective Action
A-001	3-Hazardous Materials Management	I	[HM.30.2] Facilities, that are required to prepare or have available an MSDS for a hazardous chemical under OSHA, are required to meet specific inventory reporting requirements for planning purposes [EO 13148, Sec. 501; 40 CFR 370.20(a), 370.20(b), 370.20(d), 370.25, and 370.28	The <i>EPCRA Compliance Guide and Checklist</i> indicates New Haven as a site that requires Emergency Planning and Community Right-to-Know (EPCRA) reporting by March 1, 2001, based on the types of commodities stored there (i.e., mercury, lead, etc.). As of the date of the assessment, the Center did not have documentation that the reporting had been completed.	Open
A-002	8-POL Management	I	[PO.5.6] Each SPCC plan must be reviewed at least once every 3 years [40 CFR 112.1(d) and 112.5(b)]	The Spill Prevention, Control, and Countermeasures Plan (SPCCP) has not been updated to reflect changes in the UST program.	Open
A-003	12-Wastewater Management	I	[WA.10.3] Dischargers of stormwater associated with an industrial activity are required to apply for an individual permit, apply for a permit through a group application, or seek coverage under a promulgated stormwater general permit [40 CFR 122.26(c) and 122.26(g)].	Storm Water Pollution Prevention Plan (SWP3) requires annual site compliance evaluation. The evaluation was performed in October 1998 and November 1999, but has not been accomplished in 2000.	Open

Table 4-1. Environmental Compliance Assessment Findings Summary Table (continued)

Finding ID	Protocol Area	Class	Criteria	Condition	Status of Corrective Action
<p>Notes:</p> <p>Class:</p> <p>I Noncompliance with an existing environmental regulation, compliance agreement, consent order, or operating/discharge permit. These may stem from Federal, state, or local requirements.</p> <p>Status of Corrective Action</p> <p>Open Finding has not been addressed, Finding has been addressed but corrective action is not complete, Finding sheet provides detailed information.</p> <p>Closed Finding has been addressed, and corrective action is complete.</p>					

5.0 REGULATORY COMPLIANCE STATUS

5.0.0.0.1 This section provides the onsite assessment summary and findings for the 13 regulatory protocol areas addressed during the DNSC-New Haven ECA (protocol areas are listed in Section 2.0 of this report).

5.0.0.0.2 In the following sections, the assessment summary describes the facilities inspected and the records reviewed. No physical or chemical samples were taken as part of this assessment. The findings summary describes the overall compliance status of each protocol area.

5.0.0.0.3 Individual finding sheets for each protocol are provided in Section 6.0 of this report. The findings documented in this report are classified as Class I.

5.0.0.0.4 Findings classified as Class II, Class III, and H&S were provided as an addendum with this document, but are not considered a part of the draft report.

5.0.0.0.4 Class I Findings: Immediate noncompliance with an existing environmental regulation, compliance agreement, consent order, operating/discharge permit or existing NOV.

5.0.0.0.5 Class II Findings: Future noncompliance with an environmental regulation, compliance agreement, consent order, or an existing NOV.

5.0.0.0.6 Class III Findings: Findings for which there are no specific Federal, state, or local regulatory requirements. These findings will include deviations from DLA regulations, DoD directives, or MPs.

5.0.0.0.7 H&S Findings: These findings are related to OSHA, DOT, and NFPA. Most H&S findings are in the Hazardous Materials Management (e.g., Section 3) protocol.

H&S findings may be regulatory but are not part of the RCS 1383 reporting process and not eligible for environmental funding. H&S findings are not classified as Class I, II, or III.

5.0.0.0.8 Significant Finding: A finding sub-categorized as significant requires immediate attention. It poses, or has a high likelihood to pose, a direct and immediate threat to human health, safety, the environment, or the mission.

5.1 Air Emissions Management

5.1.1 Assessment Summary

5.1.1.0.1 DNSC-New Haven operates a variety of operations which result in the emission of air pollutants. Air emission sources include aboveground storage tanks (ASTs), underground storage tanks (USTs), and boilers.

5.1.2 Findings Summary

5.1.2.0.1 There were no findings for this protocol.

5.2 Cultural Resources Management

5.2.1 Assessment Summary

5.2.1.0.1 The DLA study "Examination of Natural and Cultural Resource Management Needs at DLA-Managed Sites" (KPMG Peat Marwick, 1996), has identified that there is no need for an Integrated Cultural Resources Survey and/or Management Plan.

5.2.1.0.2 A "Cultural Resources Assessment for Defense National Stockpile Center, New Haven, Indiana" (USDA Forest Service, 1999) determined that there are no structures, buildings, or objects that appear eligible for listing either as a district or as individual buildings. No prehistoric archeological resources were discovered. No archeological investigations are currently recommended.

5.2.2 Findings Summary

5.2.2.0.1 There were no findings for this protocol.

5.3 Hazardous Materials Management

5.3.1 Assessment Summary

5.3.1.0.1 DNSC-New Haven utilizes a number of warehouses to receive and store various hazardous materials. All warehouses and buildings that store or use hazardous materials were assessed during the audit. Hazardous material storage cabinets were audited, Material Safety Data Sheets (MSDSs), training records, emergency spill response plans, and handling procedures were reviewed.

5.3.2 Findings Summary

5.3.2.0.1 The overall compliance of hazardous material management was good.

5.3.2.0.2 *The EPCRA Compliance Guide and Checklist* indicates New Haven as a site that requires EPCRA reporting by March 1, 2001, based on the types of commodities stored there (i.e., mercury, lead, etc.). As of the date of the assessment, the Center did not have the documentation that the reporting had been completed.

5.4 Hazardous Waste Management

5.4.1 Assessment Summary

5.4.1.0.1 DNSC-New Haven is a Conditionally Exempt Small Quantity Generator (CESQG). The hazardous waste management activities conducted at the facility consist of hazardous waste generation, hazardous waste storage, and shipment of waste for offsite treatment, recycling, or disposal. There are currently no hazardous waste treatment or disposal units at the Center.

5.4.2 Findings Summary

5.4.2.0.1 There were no findings for this protocol.

5.5 Natural Resources Management

5.5.1 Assessment Summary

5.5.1.0.1 The DLA study "Examination of Natural and Cultural Resource Management Needs at DLA-Managed Sites" (KPMG Peat Marwick, 1996) has identified that there is no need for a Natural Resources Survey and/or Management Plan.

5.5.1.0.2 The "Natural Resources Assessment for DNSC, New Haven, Indiana" (USDA Forest Service, 1998) identified no management objectives needed to improve compatibility of mission activities with natural resources.

5.5.2 Findings Summary

5.5.2.0.1 There were no findings for this protocol.

5.6 Other Environmental Issues

5.6.0.0.1 The Other Environmental Issues Protocol is comprised of five issues: Environmental Impacts (NEPA process), environmental noise, Installation Restoration Program (IRP), pollution prevention, and program management. Each of these areas is addressed separately within this section.

5.6.1 Environmental Impacts

5.6.1.1 Assessment Summary

5.6.1.1.1 DNSC-New Haven is following all procedures for complying with the National Environmental Policy Act (NEPA).

5.6.1.2 Findings Summary

5.6.1.2.1 There were no findings for this protocol.

5.6.2 Environmental Noise

5.6.2.1 Assessment Summary

5.6.2.1.1 There are no flight operations at DNSC-New Haven.

5.6.2.2 Findings Summary

5.6.2.2.1 There were no findings for this protocol.

5.6.3 Installation Restoration Program (IRP)

5.6.3.1 Assessment Summary

5.6.3.1.1 The IRP is a program to identify, characterize, and where necessary, remediate sites that have been contaminated by past land uses and that may currently pose a threat to human health or the environment.

5.6.3.1.2 Contamination assessments have been performed for DNSC-New Haven. A Final Preliminary Assessment, New Haven Depot, was prepared in January 1999. A Final Focus Site Investigation Report was prepared in February 2001.

5.6.3.1.3 The site investigations sampled soil, sediment, and surface water for evidence of past contamination from stockpile activities. Further investigations are continuing.

5.6.3.2 Findings Summary

5.6.3.2.1 There were no findings for this protocol.

5.6.4 Pollution Prevention

5.6.4.1 Assessment Summary

5.6.4.1.1 There are no regularly conducted industrial activities at DNSC-New Haven.

5.6.4.2 Findings Summary

5.6.4.2.1 There were no findings for this protocol.

5.6.5 Program Management

5.6.5.1 Assessment Summary

5.6.5.1.1 The Center manager is responsible for all environmental issues at DNSC-New Haven.

5.6.5.2 Findings Summary

5.6.5.2.1 There were no findings for this protocol.

5.7 Pesticide Management

5.7.1 Assessment Summary

5.7.1.0.1 There are no pesticides or herbicides stored or mixed at the Center. A Pest Management Plan is in effect for the DNSC-New Haven, which states that all pest management services will be provided through purchase order contracts with local companies, or performed by trained Depot personnel.

5.7.2 Findings Summary

5.7.2.0.1 There were no findings for this protocol.

5.8 Petroleum, Oil, and Lubricant (POL) Management

5.8.1 Assessment Summary

5.8.1.0.1 DNSC-New Haven maintains ASTs, and USTs.

5.8.2 Findings Summary

5.8.2.0.1 The Spill Prevention, Control, and Countermeasures Plan has not been updated to reflect changes in the UST program.

5.9 Solid Waste Management

5.9.1 Assessment Summary

5.9.1.0.1 The limited solid waste collection and disposal program is handled by contract.

5.9.2 Findings Summary

5.9.2.0.1 There were no findings for this protocol.

5.10 Storage Tanks Management

5.10.1 Assessment Summary

5.10.1.0.1 DNSC-New Haven maintains ASTs, and USTs.

5.10.2 Findings Summary

5.10.2.0.1 There were no findings for this protocol.

5.11 Toxic Substances Management

5.11.0.0.1 The Toxic Substances Management protocol consists of four issues: PCBs, Asbestos, Radon, and Lead-Based Paint.

5.11.1 PCBs

5.11.1.1 Assessment Summary

5.11.1.1.1 PCB transformers or large capacitors are currently in service at DNSC-New Haven. A PCB inventory was conducted in May 2000.

5.11.1.2 Findings Summary

5.11.1.2.1 There were no findings for this protocol.

5.11.2 Asbestos

5.11.2.1 Assessment Summary

5.11.2.1.1 An asbestos survey has been conducted. Results of the survey are on file in the Center's Environmental Office.

5.11.2.2 Findings Summary

5.11.2.2.1 There were no findings for this protocol.

5.11.3 Radon

5.11.3.1 Assessment Summary

5.11.3.1.1 The Center did not have documentation to show that a radon survey has been conducted.

5.11.3.2 Findings Summary

5.11.3.2.1 There were no findings for this protocol.

5.11.4 Lead-Based Paint

5.11.4.1 Assessment Summary

5.11.4.1.1 A lead-based paint survey has been conducted. Results of the survey are on file in the Center's Environmental Office.

5.11.4.2 Findings Summary

5.11.4.2.1 There were no findings for this protocol.

5.12 Wastewater Management

5.12.1 Assessment Summary

5.12.1.0.1 DNSC-New Haven is located next to a small industrial park. The Center has a National Pollutant Discharge Elimination System (NPDES) stormwater permit and Storm Water Pollution Prevention Plan (SWP3).

5.12.2 Findings Summary

5.12.2.0.1 The Storm Water Pollution Prevention Plan requires an annual site compliance evaluation. The evaluation was performed in October 1998 and November 1999, but has not been accomplished in 2000.

5.13 Water Quality Management

5.13.1 Assessment Summary

5.13.1.0.1 Water used by the DNSC-New Haven is supplied by the public water system from the local utility.

5.13.2 Findings Summary

5.13.2.0.1 There were no findings for this protocol.

6.0 FINDING SHEETS

6.0.0.0.1 This section presents all regulatory (Class I) findings observed during the ECA at DNSC-New Haven facility, as defined in Section 1.0.

6.0.0.0.2 Although the ECA finding sheets are generally self explanatory, there are several items that warrant further explanation, which are discussed below:

- **Protocol Area:** Refers to the 13 compliance protocols identified in Section 2.1 and the TEAM Guide (USACERL, 2000).
 - **Manual Reference:** Document used to determine the compliance with regulations, policies, or guidance. As stated in Section 2.1, the following references were used in the assessment: TEAM Guide, Indiana TEAM Guide Supplement, DLA TEAM Guide Supplement, and BNA Library.
 - **Finding Category:** As explained above, the finding category is based on the nature and extent of non-compliance. Each classification is discussed in detail in Section 1.0.
 - **Condition:** Description of finding.
 - **Criteria:** Description of regulatory, policy, or guidance requirement.
 - **Basis of Finding:** Regulatory or policy citation, or MP when no regulation exists.
- **Sampling Results:**
 - **Universe:** Total number of items (e.g., 30 garbage receptacles facility-wide);
 - **Sample Size:** Number of items reviewed (e.g., 10 out of 30 garbage receptacles);
 - **Number of Discrepancies:** Number of findings within sample size; and
 - **Percentage of Discrepancies:** Percentage of findings within sample size.

FINDING SHEET - DNCS-New Haven

Facility Location: DepotFacility Activity: Environmental Office

Tenant:

Manual: TEAM GuideRevision Date: 9/1/2000

Local Manual:

Revision Date:

Protocol Area: Hazardous Materials ManagementQuestion Number: HM.030.002

Ranking: CLASS I Neg

Finding Status: Open

Regulatory Agency: USEPA

Regulatory Agency Level: F

Condition: The *EPCRA Compliance Guide and Checklist* indicates New Haven as a site that requires Emergency Planning and Community Right-to-Know (EPCRA) reporting by March 1, 2001, based on the types of commodities stored there (i.e., mercury, lead, etc.). As of the date of the assessment, the Center did not have documentation that the reporting had been completed.

Criteria: Facilities, that are required to prepare or have available an MSDS for a hazardous chemical under OSHA, are required to meet specific inventory reporting requirements for planning purposes.

Regulatory Citation: EO 13148, Sec. 501; 40 CFR 370.20(a), 370.20(b), 370.20(d), 370.25, and 370.28

Repeat Finding: No

Previous Notice: No

Reference Previous Finding:

Reference Previous NOV:

Corrective Actions

Proposed Corrective Action:

Start DateCompleted Date

Planned Info:

Actual Info:

Estimated Corrective Action Cost: \$0.00

Actual Corrective Action Cost: \$0.00

Review Completed:

Audit Team Comments:**Audit Team:** Kwan/Tootle/Williams**Audit Date:** 03/2001**Assessment Date:** 3/22/2001**Finding Number:** A-001

FINDING SHEET - DNSC-New Haven

Facility Location: Depot

Facility Activity: Environmental Office

Tenant:

Manual: TEAM Guide

Revision Date: 9/1/2000

Local Manual:

Revision Date:

Protocol Area: POL Management

Question Number: PO.005.006

Ranking: CLASS I Neg

Finding Status: Open

Regulatory Agency: USEPA

Regulatory Agency Level: F

Condition: The Spill Prevention, Control, and Countermeasures Plan (SPCCP) has not been updated to reflect changes in the UST program.

Criteria: Each SPCC plan must be reviewed at least once every 3 years.

Regulatory Citation: 40 CFR 112.1(d) and 112.5(b)

Repeat Finding: No

Previous Notice: No

Reference Previous Finding:

Reference Previous NOV:

Corrective Actions

Proposed Corrective Action: Update plan.

Start Date

Completed Date

Planned Info:

Actual Info:

Estimated Corrective Action Cost: \$0.00

Actual Corrective Action Cost: \$0.00

Review Completed:

Audit Team Comments:

Audit Team: Kwan/Tootle/Williams

Audit Date: 03/2001

Assessment Date: 3/22/2001

Finding Number: A-002

FINDING SHEET - DNSC-New Haven

Facility Location: DepotFacility Activity: Environmental Office

Tenant:

Manual: TEAM GuideRevision Date: 9/1/2000

Local Manual:

Revision Date:

Protocol Area: Wastewater ManagementQuestion Number: WA.010.003

Ranking: CLASS I Neg

Finding Status: Open

Regulatory Agency: USEPA

Regulatory Agency Level: F

Condition: Storm Water Pollution Prevention Plan (SWP3) requires annual site compliance evaluation. The evaluation was performed in October 1998 and November 1999, but has not been accomplished in 2000.

Criteria: Dischargers of stormwater associated with an industrial activity are required to apply for an individual permit, apply for a permit through a group application, or seek coverage under a promulgated stormwater general permit.

Regulatory Citation: 40 CFR 122.26(c) and 122.26(g)

Repeat Finding: No

Previous Notice: No

Reference Previous Finding:

Reference Previous NOV:

Corrective Actions

Proposed Corrective Action: Perform annual compliance evaluation.

Start DateCompleted Date

Planned Info:

Actual Info:

Estimated Corrective Action Cost: \$0.00

Actual Corrective Action Cost: \$0.00

Review Completed:

Audit Team Comments:**Audit Team:** Kwan/Tootle/Williams**Audit Date:** 03/2001**Assessment Date:** 3/22/2001**Finding Number:** A-003

7.0 REFERENCES

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- KPMG Peat Marwick. 1996. Examination of Natural and Cultural Resource Management Needs at DLA-Managed Sites.
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- Parsons Engineering Science. January 1999. Final Preliminary Assessment, New Haven Depot, New Haven, Indiana.
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- U.S. Army Construction Engineering Research Laboratories (USACERL). September 2000. The Environmental Assessment and Management (TEAM) Guide. Champaign, Illinois.
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