



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 11/30/2022
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Industrial Discharge Program
Facility Name: Naval Support Facility Indian Head (NSFIH)
Permittee(s): Naval Support Facility Indian Head (NSFIH)
Facility Operator: Naval Support Facility Indian Head (NSFIH)
Permittee Address: 3972 Ward Road, Suite 101, Indian Head, Maryland 20640-5157
Facility Address: 3972 Ward Road, Suite 101, Indian Head, Maryland 20640-5157
Facility Latitude: 38.596648
Facility Longitude: -77.179034
County/Parish: Charles County
Permit No: MD0003158
NAICS Code: 562219
SIC: 4953
Unique Project #: 3E23WN016A

Facility Representative(s): Chris Goddard **Point of Contact**
Email: christopher.j.goddard2.civ@us.navy.mil ☒

EPA Inspectors:
Kaitlin McLaughlin – EPA Region III
Phone: (215) 814-2393 Email: McLaughlin.Kaitlin@epa.gov
Michael Greenwald – EPA Region III
Phone: (215) 814-2398 Email: Greenwald.Michael@epa.gov

State/Local Inspectors (see report body for list of additional inspectors):
Greg Kolarik
Email: greg.kolarik@maryland.gov

**Report Preparer
Signature/Date**

Kaitlin McLaughlin
Kaitlin McLaughlin, Enforcement Officer
NPDES Enforcement Section (3ED32)

2/2/2023

Date

**Supervisor
Signature/Date**

Mark Zolandz, Section Chief
NPDES Enforcement Section (3ED32)

Date

Unique Project#: 3E23WN016A

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I. Introduction

On November 30, 2022, an inspection team composed of staff from the U.S. Environmental Protection Agency (“EPA”) Region III (hereinafter, “EPA Inspection Team”) conducted an inspection of the Naval Support Facility Indian Head (NSFIH) Industrial Discharge Program. The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and to verify compliance with the facility’s National Pollutant Discharge Elimination System (NPDES) Permit No. MD0003158 (hereinafter, the “Permit”) and applicable State and Federal regulations.

A. Inspection Opening Conference

The EPA Inspection Team arrived at the facility at approximately 8:00 AM. Representatives from the Maryland Department of the Environment (MDE) were in attendance. The following inspectors and representatives were present for the inspection:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors			
Kaitlin McLaughlin	EPA Region III	215-814-2393	McLaughlin.Kaitlin@epa.gov
Michael Greenwald	EPA Region III	215-814-2398	Greenwald.Michael@epa.gov
Facility Representatives			
Linsey De La Rosa	NSFIH EV	956-975-7415	linsey.delarose.civ@us.navy.mil
Hayden Dermanelian	NSWC	703-587-1681	hayden.dermanelian.civ@us.navy.mil
William Fabey	NSFIH EV	301-997-3776	william.b.fabey.civ@us.navy.mil
Chris Goddard	NSFIH EV	240-298-4376	christopher.j.goddard2.civ@us.navy.mil
Tara Meadows	NSFIH EV	202-718-0665	tara.l.meadows2.civ@us.navy.mil
Kenneth Robitaille	NSFIH EV	202-718-0682	kenneth.r.robitalle.civ@us.navy.mil
Diana Rose	NSFIH EV	301-744-2267	diana.l.rose.civ@us.navy.mil
Victoria Waranoski	NAVFAC EV	202-685-8056	victoria.m.waranoski.civ@us.nvy.mil
State or County Representatives			
Greg Kolarik	MDE	443-532-9020	greg.kolarik@maryland.gov

Kaitlin McLaughlin and Michael Greenwald displayed their credentials to the facility representatives at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with its Permit. A copy of the Permit is provided in [Attachment 1](#).

B. Weather and Precipitation Conditions

The closest National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in Table 2 below.

Table 2. Precipitation Data

Station Name	Date	Precipitation Amount (inches) ¹
ALEXANDRIA 6.6 WNW, VA US US1VAFX0081	11/24/22	0.00
ALEXANDRIA 6.6 WNW, VA US US1VAFX0081	11/25/22	0.11

¹ Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

ALEXANDRIA 6.6 WNW, VA US US1VAFX0081	11/26/22	0.04
ALEXANDRIA 6.6 WNW, VA US US1VAFX0081	11/27/22	0.00
ALEXANDRIA 6.6 WNW, VA US US1VAFX0081	11/28/22	0.19
ALEXANDRIA 6.6 WNW, VA US US1VAFX0081	11/29/22	0.00
ALEXANDRIA 6.6 WNW, VA US US1VAFX0081	11/30/22	0.21
ALEXANDRIA 6.6 WNW, VA US US1VAFX0081	12/1/22	0.08

II. Facility Activity

NSFIH is a naval base which consists of various industrial activities including explosive and propellant manufacturing, research, development, assembly, and testing. The facility discharges industrial wastewater, stormwater, and various process wastewaters.

The facility implements an industrial program and is regulated under the Permit, which became effective on June 1, 2022 and expires on May 31, 2027. The facility discharges through various outfalls to the Potomac River and the Mattawoman Creek, both designated as Use II under the Cost of Maryland Regulations (COMAR) 26.08.02.02 protected for water contact recreation, fishing, aquatic life, wildlife, and support of shellfish harvesting (non-shellfish harvesting) water and is protected for estuarine and marine aquatic life.

The inspection included discussions with industrial staff, file reviews, and field visits. The discharge locations are documented in the facility's Storm Water Pollution Prevention Plan (SWPPP) ([Attachment 3](#)). A certification statement is included with the SWPPP that was signed by the facility on March 29, 2022.

The EPA Inspection Team conducted additional on-site interviews and reviewed a portion of the facility's records. Additional records were reviewed offsite.

Observations based on both the offsite compliance review and the field visits are documented in the sections below.

III. Observations

The inspection began with a records review and interview questions. The inspection observations below are made pursuant to the requirements of the Permit. Photographs were taken during the inspection by a facility representative Linsey De La Rosa and are provided in [Attachment 2](#). The Photograph Log referenced throughout this inspection report is designated as Controlled Unclassified Information (CUI).

The EPA Inspection Team traveled to and inspected the outfalls discussed below in this section with facility representatives. Facility representatives stated that each of the industrial outfalls are sampled once a month and recorded in the monthly field log. The October 2022 Industrial Outfalls Monthly Field Log is provided in Attachment 4.

The Permit has the outfalls divided into different Groups based on the effluent limitations and monitoring requirements of each outfall. The EPA Inspection Team visited an outfall from each Group.

The Group 3 outfall the EPA Inspection Team visited was Outfall 1696 (Photograph Log, Page 48). Outfall 1696 is located at the Agile Plant and consists of non-contact cooling water. Photograph Log, Pages 49-52 show downstream of outfall 1696.

The groundwater outfall the EPA Inspection Team visited was groundwater discharge 696 outside of Building 696. The discharge is from a sink inside Building 696 (Photograph Log, Page 69) which flows into a PVC pipe under the sink (Photograph Log, Page 68) and through the wall outside (Photograph Log, Pages 66 and 67). The discharge from outfall 696 is hand and wash sink wastewater.

The Group 5 outfall the EPA Inspection Team visited was outfall 107 (Photograph Log, Page 70). Outfall 107 is located at Building 3123 which is a Reverse Osmosis Building. The discharge out of outfall 107 is reverse osmosis reject water.

The Group 4 outfall the EPA Inspection Team visited was outfall 140 (Photograph Log, Pages 73 and 71). Outfall 140 is located at the former coal pile runoff area. There previously used to be a coal plant at this location with coal storage piles. Facility representatives stated that the plant had been demolished and the last coal piles had been removed over 4 years ago. Facility representatives also stated that the outfall is still designated as a coal pile runoff discharge outfall in the permit because MDE requires the piles to have been removed for at least 5 years.

Observation 1. At the time of the inspection, The EPA Inspection Team observed foam in outfall 140 (Photograph Log, Page 72). The EPA Inspection Team also observed the upstream drainage area leading to outfall 140 (Photograph Log, Page 74) and did not observe any foam.

The Group 6 outfall the EPA Inspection Team visited was outfall 100A. At the time of the inspection, the outfall pipe was below the surface of the water of the settling pond (Photograph Log, Pages 77 and 78). There is signage at the 100A settling pond describing the pool of water (Photograph Log, Pages 75 and 76). The discharge from outfall 100A consists of river water backflush.

The Group 2 outfall the EPA Inspection Team visited was outfall 1030 (Photograph Log, Page 81). The outfall is located at the Trident Facility. The sampling location is inside the building, but the discharge flows through a PVC pipe into the floor of the building (Photograph Log, Page 83) and out of the side of the building (Photograph Log, Page 84). The PVC pipe ends in a swale outside and the flow continues downstream (Photograph Log, Pages 85-87). The discharge from outfall 1030 is comprised of non-contact cooling water and groundwater infiltration.

The Group 1 outfall the EPA Inspection Team visited was outfall 849 (Photograph Log, Page 89) located inside Building 849. The outfall line drains to a cooling well outside the building (Photograph Log, Page 91) then discharges to a ditch (Photograph Log, Page 90) and continues downstream. The discharge out of outfall 849 is non-contact cooling water.

IV. Records Review

EPA requested and received copies of the following documents:

- Last 3 months of Net DMRs
- Building 849 settling tank info
- Most recent monthly field sheet

Records pertaining to the inspection report are attached, with additional records being kept on file.

V. Closing Conference

After the site walk, the EPA Inspection Team met with the site representatives for a closing conference. The EPA Inspection Team shared preliminary observations with the site representatives. The EPA Inspection Team reiterated to the site representatives that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by EPA upon the additional review of records and documentation. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference after EPA reviewed additional materials following the inspection.

The industrial inspection was the second inspection of a three-part CWA inspection of NSFIH. The third and final inspection of NSFIH was concluded on December 1, 2022. At the conclusion of the third inspection, the EPA Inspection Team met with site representatives for a comprehensive closing conference. The EPA Inspection Team shared preliminary observations with the site representatives and reiterated the above information.

The final closing conference concluded at approximately 3:00 PM on December 1, 2022.

VI. List of Attachments

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| Attachment 1. | NPDES Permit |
| Attachment 2. | Photograph Log |
| Attachment 3. | SWPPP |
| Attachment 4. | October 2022 Industrial Outfalls Monthly Field Log |