

COMPLIANCE HISTORY for the
Tooele Army Depot (TEAD)
Storage and Incineration Permit
and
Post-closure Permit

ACTION: **NOTICE OF VIOLATION** issued February 6, 2013

ISSUES: Failing to repair cracks in the containment berm in Building 528; and failing to notify the Director of the problem.
Failing to record the kiln rotation speed for the deactivation furnace.
Exceeding the semivolatile metals feed rate limit to the deactivation furnace.
Failing to have sufficient waste analysis information prior to incinerating HEI M56A3 projectiles.
Exceeding the aluminum feed rate limit to the hydrolysis system.
Failing to have sufficient waste analysis information for munitions fed to the hydrolysis system.
Feeding wastes to the hydrolysis system when the hydrogen monitor was not operating properly and accurately.
Exceeding the NEW treatment limits for the OB/OD Munitions Treatment Unit.
Failing to dispose of restricted wastes within one year after generation.

RESOLUTION: **STIPULATION AND CONSENT ORDER** signed June 25, 2013. It includes a penalty of \$11,839.00.

ACTION: **Warning Letter** issued on November 28, 2011

ISSUES: Discrepancies on the daily logs at the Hydrolysis Facility, inconsistencies between the daily log record, the operating record, and the form 4508s for the Small Caliber Ammunition Disassembly Line.

RESOLUTION: TEAD responded on January 19, 2012 outlining corrective actions undertaken to correct the problems noted.

ACTION: **Warning Letter** issued on November 23, 2010

ISSUES: Inaccurate daily logs at the Hydrolysis Facility, insufficient training of hydrolysis operators, deficient inspection logs and operating record discrepancies at the Small Caliber Ammunition Disassembly Line.

RESOLUTION: TEAD responded on December 14, 2010 describing corrective actions undertaken to correct the problems noted.

ACTION: **Warning Letter** issued on August 17, 2010

ISSUES: Failure to maintain lids on rocket silo areas at the OB/OD treatment area when not in operation and failure to remove burnt out rocket skeletons.

RESOLUTION: TEAD submitted on September 14, 2010 a permit modification that will correct future problems at the rocket silo treatment area.

ACTION: **NOTICE OF VIOLATION and COMPLIANCE ORDER** issued August 28, 2008

ISSUES: Storing restricted hazardous waste for longer than one year.

RESOLUTION: TEAD responded September 15, 2008 and on November 3, 2008 with a compliance schedule for treatment of restricted hazardous wastes. On March 16, 2011, TEAD completed treatment of restricted hazardous wastes.

ACTION: **NOTICE OF VIOLATION** issued December 6, 2006

ISSUES: Failing to operate the deactivation furnace to minimize the possibility of a fire, and failing to design and operate the hydrolysis facility to minimize the possibility of sudden or non-sudden releases to the air and surrounding areas
Improperly labeling and dating containers, and having open containers
Failing to clean up spills of hazardous waste

RESOLUTION: **STIPULATION AND CONSENT ORDER** signed May 29, 2007. It includes a penalty of \$10,555.00.

ACTION: **NOTICE OF VIOLATION and COMPLIANCE ORDER** issued December 8, 2005

ISSUES: Failing to record the required operating data while burning hazardous wastes.
Failing to train personnel using the computer based system and by failing to use the computer database for recording training results.

RESOLUTION: **STIPULATION AND CONSENT ORDER** signed June 30, 2006. It includes a penalty of \$6,135.00.

ACTION: **NOTICE OF VIOLATION and COMPLIANCE ORDER** issued December 17, 2003

ISSUES: Failing the DRE performance standard of 99.99% for hexachlorobenzene.
Exceeding a combustion gas velocity of 53 feet per second at the stack.

RESOLUTION: **STIPULATION AND CONSENT ORDER** signed February 4, 2005. It includes a penalty of \$11,600.00.

ACTION: **NOTICE OF VIOLATION** issued March 28, 2001

ISSUES: Failing to maintain and operate systems to automatically cut off hazardous waste feed to the incinerator at a kiln rotation of less than 1.0 rpm, at a kiln gas exit temperature of greater than 750EF, at a baghouse inlet temperature of less than 750EF and greater than 1200EF, and at a corrected carbon monoxide concentration of greater than 100 ppmv on a one hour rolling average basis; and by failing to maintain and operate systems to immediately cut off waste feed to the incinerator for high and low kiln pressure, low baghouse differential pressure, low baghouse temperature, and low kiln exit gas temperature.
Failing to retain all monitoring records required by the Permit for at least three years.
Failing to correct any malfunctions of the automatic waste feed cut-off systems before restarting the incinerator.
Failing to adjust the calibration of the carbon monoxide monitor when the daily calibration drift check indicated that the drift exceeded the specification (six ppm for the low range analyzer).

RESOLUTION: **STIPULATION AND CONSENT ORDER** signed December 6, 2001. It includes a penalty of \$26,720.00.

ACTION: **Compliance Inspection**, August 1997

ISSUES: One drum of hazardous waste was not labeled properly.
One drum of hazardous waste was not oriented so the label could be read.
One fire extinguisher did not have adequate operating pressure.
One employee was three days late in completing his yearly hazardous waste training.

RESOLUTION: An Observations letter was sent on January 6, 1998.

ACTION: **Facility Compliance Inspection**, September 1995.

ISSUES: Review of records indicated waste water discharged from a building contained hazardous waste (the discharge was stopped several months before the inspection). .
An emergency permit was requested after munitions were stored over night at OB/OD.
Some training discrepancies were noted.
A small number of drums in storage did not have adequate aisle space.
The gate at the Industrial Waste Lagoon was not locked.
A piece of furnace duct was found outside of the furnace area.
A fire extinguisher did not have adequate operating pressure.
Part of a SWMU was not fenced.
A shipment of hazardous waste brine from the TOCDF was erroneously received for disposal because it was not labeled properly.

RESOLUTION: Warning letter was sent, July 30, 1996. A request for additional information was sent on April 21, 1997. Response was received on May 2, 1997.

NOTE: The vehicle rebuild area was closed for work in the fall of 1995 as that portion of the TEAD mission was transferred to other locations.

ACTION: **Warning Letter**, April 24, 1995.

ISSUES: Two employees had not completed annual hazardous waste training.
Employee handling hazardous waste was not trained.
Inspector failed to sign inspection log in hazardous waste storage building.
Hazardous waste labels on hoppers removed prematurely.

RESOLUTION: Not Applicable.

ACTION: **NOTICE OF VIOLATION** issued February 16, 1994.

ISSUES: Accumulated bead blast material in drain gate longer than 90 days.
No hazardous waste determination made on a waste material from the Consolidated Maintenance Facility.
Two containers with paint mixture and thinner in them were not labeled.
Garbage can for waste, paint contaminated rags was not under the control of the painter.
Container of spent glass bead blast material was not labeled and did not have a date of accumulation on it. Also, this material, spent walnut blast media and spent carbon from the waste water treatment facility was found on floor/ground.
Treatability study preparation was started before the end of the 45 day notification period.

The disposition of residue from a treatability study was not reported to the State.

A floor vault containing hazardous waste was not labeled or dated. Some personnel working in hazardous waste management were not familiar with the TEAD-N contingency plan.

Two employees working with hazardous waste were identified as not participating in the annual review of their initial hazardous waste training.

Hazardous Waste Shipping Manifests were not filled out properly.

The following Land Disposal Restriction violations were noted: a.)

Recipient of hazardous waste was not notified of appropriate treatment standards, b.) In two cases, EPA hazardous waste numbers were not on the land disposal restrictions for the manifest, c.) Waste analysis data were not included on the land disposal restriction certification on a manifest, and d.) The dates that the waste was subject to land disposal restrictions was not on three shipping manifests.

RESOLUTION: Penalty paid on December 27, 1995 of \$12,000. In addition paid \$30,000 for their portion of the cost of a study to determine the health and safety effects of OB/OD operations on the citizens of Tooele County.

ACTION: **WARNING LETTER** issued September 13, 1993.

ISSUES: Used bag house bypass during shut down of furnace.

RESOLUTION: Not Applicable.