

COMPLIANCE HISTORY
FOR THE
TOOELE ARMY DEPOT NORTH AREA (TEAD-N)
STORAGE AND INCINERATION PERMIT
AND
POST-CLOSURE PERMIT

ACTION: **WARNING LETTER** issued on July 14, 2021

ISSUES: Inadequate training documentation.
Hazardous waste in open, unlabeled containers.
Accumulation start date missing on a hazardous waste accumulation drum.

RESOLUTION: TEAD-N responded on August 5, 2021, outlining corrective actions undertaken to correct the problems noted.

ACTION: **WARNING LETTER** issued on October 20, 2020

ISSUES: Inspection forms for newly permitted storage areas were missing from the inspection checklist.
There were inconsistent personnel training dates.
Missing a Calibration Error test for the continuous emissions monitoring system at the furnace.
Errors in conducting the Response Time test for the continuous emissions monitoring system at the furnace.
Missing quarterly tests of the accelerometer on the pull-apart system.
Missing the storage-in-place inspection form for the rocket motors in one of the open detonation pits.
Failure to document the corrective action performed for a problem noted on an inspection.
Accumulation start date missing on a hazardous waste accumulation drum.

RESOLUTION: TEAD-N responded on November 24, 2020, outlining corrective actions undertaken to correct the problems noted.

ACTION: **NOTICE OF VIOLATION** issued on September 12, 2019

ISSUES: Shipping a load of hazardous waste projectiles without proper labeling and without a hazardous waste manifest.
Failing to record an alarm when the kiln rotation drops below the permit limit; and by failing to record the kiln rotation as a triggering parameter for the automatic waste feed cut-off system.
Failing to perform daily calibration checks of the continuous emissions monitoring system; by failing to recalibrate the oxygen monitor when

it exceeded the calibration drift limit; and by failing to perform the Response Time Test.
Failing to conduct daily inspections of the incineration system.

RESOLUTION: **STIPULATION AND CONSENT ORDER** signed April 27, 2020. It includes a penalty of \$20,153.

ACTION: **WARNING LETTER** issued on November 28, 2018

ISSUES: Missing signs at the new pull-apart unit (Building 1335).
Annual refresher training missing for two employees; incorrect training dates in records.
Discrepancies between the quantities listed in the storage operating record and those listed on the pallets of ammo boxes.
Discrepancies among the Demil Doc, the Daily Log Record, and the Deactivation Furnace Operating Record.
Errors in the electronic form for the quarterly Calibration Error test.
Missing daily Calibration Drift tests.
A subsequent drift check was not performed when the deactivation furnace CEMS drift check failed.
Errors in the electronic form for the daily Calibration Drift test.
Incomplete or missing inspection logs.
Discrepancies between the Daily Log Record and the Operating Record for the SPAM.
The baghouse at Building 1335 was being inspected on a weekly basis instead of a daily basis.
There was no documentation to show that there is a check of the OB/OD area prior to treatment to ensure that no livestock are present.
Dirt from grading the OB/OD area had piled up along the edges of the pans such that there was no space between the pan and the ground to conduct visual inspections.

RESOLUTION: TEAD-N responded on December 20, 2018 outlining corrective actions undertaken to correct the problems noted.

ACTION: **NOTICE OF VIOLATION** issued on October 11, 2017

ISSUES: Failing to conduct weekly inspections at the small caliber disassembly line (Building 1325) when the facility is in use.
Failing to train new personnel working with or around hazardous waste within six months after their assignment to a new position at the facility.
Failing to use the hazardous waste manifest when transporting shipments of hazardous wastes offsite.
Failing to maintain an accurate operating record that records the quantity of hazardous waste at each location and the quantity of hazardous wastes treated at the facility.

Failing to conduct daily calibration drift checks for each of the continuous emissions monitors; and by failing to document that the calibration meets the specification after adjustment.

Open burning hazardous wastes at the AED test site without a valid treatability study or emergency permit.

RESOLUTION: **STIPULATION AND CONSENT ORDER** signed December 4, 2018. It includes a penalty of \$12,348.

ACTION: **WARNING LETTER** issued on December 6, 2016

ISSUES: The methods specified in the Waste Analysis Plan were out of date.
The emergency equipment listed in the Preparedness and Prevention Plan was out of date.
Discrepancies between the deactivation furnace Daily Log Record and the deactivation furnace Operating Record; missing inspection logs for the deactivation furnace.
The quarterly Calibration Error audit was conducted late.
A subsequent drift check was not performed when the deactivation furnace CEMS drift check failed.
Breathing zone sampling and analysis at the hydrolysis system delayed.

RESOLUTION: None required

ACTION: **WARNING LETTER** issued on November 17, 2015

ISSUES: Missing inspection logs and errors on inspection logs.
Discrepancies in the Operating Record.
Failing to perform a quarterly Calibration Error test.
Overfilling the hydrolysis reaction tank and discharging the spilled material to the ground.

RESOLUTION: TEAD-N responded on December 16, 2015 outlining corrective actions undertaken to correct the problems noted.

ACTION: **WARNING LETTER** issued on January 26, 2015

ISSUES: Leaving residue in the drip pans at the hydrolysis facility.
Missing inspection logs for the Decinerator.
Failing to update the Contingency Plan

RESOLUTION: None required

ACTION: **WARNING LETTER** issued on December 2, 2013

ISSUES: There was a crease in a fiber drum that contained hazardous waste.
The deactivation furnace feed system was not programmed so that the feed rate limit could not be exceeded.
The planning sheet indicated that recovered propellant was to be burned, but a decision hadn't actually yet been made.
The wrong feed recipe was downloaded to the control system, which resulted in an exceedance of the PEP feed rate limit to the deactivation furnace.

RESOLUTION: None required

ACTION: **NOTICE OF VIOLATION** issued on 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 on 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 on 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 on 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 on 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 750°F, at a baghouse inlet temperature of less than 750°F and greater than 1200°F, 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: **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** issued on 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 on 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 on September 13, 1993.

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

RESOLUTION: Not Applicable.